

Comments and Responses Table: CDC Gas to Power Gas Infrastructure Project

This Comments and Responses Table presents the comments and issues raised by stakeholders on the Background Information Document (distributed on the 22nd January 2016 and with a comment period from 22 January to 22 February 2016), the Coega Environmental Liaison Committee Meeting (held 20 August 2020) and the Draft Scoping Report (distributed on the 9th October 2020 and with a comment period from 9 October to 9 November 2020).

Comments are reproduced verbatim and are grouped according to stakeholder. Responses to comments made on the BID, which were provided in the Draft Scoping Report, have been updated as appropriate. New responses are provided for comments made on the Draft Scoping Report.

Responses to issues are provided by one or more of the following parties:

- SRK: responses recorded in the table are made by SRK, unless otherwise indicated. SRK responses are as a rule limited to issues that relate to the EIA process; and
- CDC design team: responses applicable to the proposed development.
- Relevant specialists contracted to the project: responses applicable to their particular scopes of work.

Copies of all original comments received by SRK during the Scoping Phase (including the comments on the BID) are collated in Appendix G of the Final Scoping Report.

IAP Database

Table 1: Database of registered IAPs, Stakeholders and Authorities

Name	Organisation	Capacity	Notified	Registered
Mr Dayalan Govender	Department of Economic Development, Environmental Affairs & Tourism	Regional Manager	✓	✓
Mr Andries Struwig	Department of Economic Development, Environmental Affairs & Tourism	Assistant Director IEM	✓	✓
Mr Sibulele Nondoda	Department of Economic Development, Environmental Affairs & Tourism	Coastal Zone Management (Cacadu Region)	✓	✓
Mr Lyndon Mardon	Department of Economic Development, Environmental Affairs & Tourism	Manager: Air Quality	✓	✓
Dr Monde Mayekiso	Department of Environmental Affairs: Ocean And Coast	Coastal Pollution Management	✓	✓
Mrs Nitasha Baijnath-Pillay	Department of Environmental Affairs: Ocean And Coast	Coastal Pollution Management	✓	✓
Mr Reuben Molale	Department of Environmental Affairs: Ocean And Coast	Coastal Pollution Management	✓	✓

Name	Organisation	Capacity	Notified	Registered
Dr Yazeed Peterson	Department of Environmental Affairs: Ocean And Coast	Coastal Pollution Management	✓	✓
Mr Mulalo Tshikotshi	Department of Environmental Affairs: Ocean And Coast	Pollution Manager	✓	✓
Ms Milicent Solomons	Department of Environment Forestry and Fisheries	Director: Strategic Infrastructure Development	✓	✓
Mr Muhammad Essop	Department of Environment Forestry and Fisheries	Assistant Director –:Priority Infrastructure Projects	✓	✓
Mr Coenrad Agenbach	Department of Environment Forestry and Fisheries	Strategic Infrastructure Development	✓	✓
Mrs Masina Lotoane	Department of Environment Forestry and Fisheries	Environmental Impact Management	✓	✓
Mr Wayne Hector	Department of Environment Forestry and Fisheries	Deputy Director: Strategic Infrastructure Development	✓	✓
Dr Thuli Mdluli	Department of Environment Forestry and Fisheries	Air Quality Manager	✓	✓
Ms Lerato Moha	Department of Environment Forestry and Fisheries	Air Quality	✓	✓
Mr Vumile Senene	Department of Environment Forestry and Fisheries	Air Quality	✓	✓
Adv Avhantodi Munyai	Department of Environment Forestry and Fisheries	Air Quality	✓	✓
Mr Olebogeng Matshediso	Department of Environment Forestry and Fisheries	Air Quality	✓	✓
Mr Stanley Tshitwamolomoni	Department of Environment Forestry and Fisheries	Biodiversity	✓	✓
Mr Sibonele Mbanjwa	Department of Environment Forestry and Fisheries	Climate Change adaptation	✓	✓
Mr Mapula Tshangela	Department of Environment Forestry and Fisheries	Climate Change mitigation	✓	✓
Mr Mactavish Makwarela	Department of Environment Forestry and Fisheries	Climate Change mitigation	✓	✓
Mr Jongikhaya Witi	Department of Environment Forestry and Fisheries	Climate Change monitoring and evaluation	✓	✓
Ms Phumeza Skepe	Department of Environment Forestry and Fisheries	Environmental Impact Management	✓	✓
Ms Marisa Bloem	Department of Water & Sanitation	Water Use Licences	✓	✓
Ms Thandi Mmachaka	Department of Water & Sanitation	Water Quality Management	✓	✓

Name	Organisation	Capacity	Notified	Registered
Ms Ncumisa Mnotoza	Department of Water & Sanitation	Water Quality Management	✓	✓
Ms Babalwa Layini	Department of Agriculture, Forestry & Fisheries	Forestry Officer	✓	✓
Mr Sello Mokhanya	Eastern Cape Provincial Heritage Resources Agency	Heritage Officer	✓	✓
Mr Monde Manga	Department of Public Works	District Roads Engineer	✓	✓
Mr McDonald Mdhuli	Department of Mineral Resources	Environmental Management	✓	✓
Ms Deidre Thompson	Department of Mineral Resources	Deputy Director: Mine Environmental Management	✓	✓
Mr Azwihangwisi Mulaudzi	Department of Mineral Resources	Manager	✓	✓
Ms Brenda Ngebulana	Department of Mineral Resources	Acting Regional Manager	✓	✓
Mr Vusi Kubheka	Department of Mineral Resources	ASD: Mineral Regulation	✓	✓
Ms Ane Oosthuizen	Sanparks		✓	✓
Br Rob Milne	Sanparks		✓	✓
Mr Anton Rautenbach	Telkom SA	Wayleave Management EC	✓	✓
Ms Andrea Shirley	CDC	Environmental Management	✓	✓
Mr Graham Taylor	CDC	Spatial Development	✓	✓
Ms Khuthala Somdaka	CDC		✓	✓
Mr Duane Mouton	CDC		✓	✓
Ms Viwe Biyana	CDC		✓	✓
Mr Mandilakhe Mmodana	TNPA	Environmental Management	✓	✓
Mr Thulani Debeko	TNPA	Harbour Master	✓	✓
Mr Elliot Motsoahole	TNPA	Environmental Management	✓	✓
Ms Renee de Klerk	TNPA	Environmental Officer	✓	✓
Mr Mpatisi Pantsi	TNPA	SHE Manager	✓	✓
Mr Chuma Mtati	Eskom	Distribution	✓	✓
Mr Raymond Couch	Telkom	Operations Manager	✓	✓

Name	Organisation	Capacity	Notified	Registered
Ms Adele Bezuidenhout	Department of Labour	Operations	✓	✓
Ms Chumisa Njingana	SANRAL	Statutory Control Officer	✓	✓
Ms Annedene Bantom	Transnet	Operations Manager	✓	✓
Ms Bongji Stofile	SAMSA	Operations Manager	✓	✓
Ms Nivashni Govender	AfriSam (South Africa) (Pty) Ltd	Coega SEZ tenant	✓	✓
Mr John Drinkwater	Cerebos Ltd	Coega SEZ tenant	✓	✓
Mr Adrian Vardy	Dynamic Commodities	Coega SEZ tenant	✓	✓
Mr George Yerolemou	Acoustex	Coega SEZ tenant	✓	✓
Joy De Plessis	Sanitech	Coega SEZ tenant	✓	✓
Magna Van Blerk	Sanitech	Coega SEZ tenant	✓	✓
Frans Stapelberg	Stapelberg Prop Trust	Coega SEZ tenant	✓	✓
Aaron Lench	The Courier Guy	Coega SEZ tenant	✓	✓
Duane Calitz	Cape Concentrate	Coega SEZ tenant	✓	✓
JOY DE PLESSIS	UTI	Coega SEZ tenant	✓	✓
Mr Jamie Wates	UTI	Coega SEZ tenant	✓	✓
Mr Alistair Stallenberg	Digistics	Coega SEZ tenant	✓	✓
Mr Jackson Tutu	Digistics	Coega SEZ tenant	✓	✓
Mr Raymond Mumble	Digistics	Coega SEZ tenant	✓	✓
Mr Ashwin Langeveldt	Bosun Bricks	Coega SEZ tenant	✓	✓
Ms Chantell Spence	Bosun Bricks	Coega SEZ tenant	✓	✓
Mr Wayne Poulton	Bosun Bricks	Coega SEZ tenant	✓	✓
Mr Gonzalo Ramirez	Ecxcelerate Energy	Coega SEZ tenant	✓	✓
Ellian Peterson	Discovery Health	Coega SEZ tenant	✓	✓
Hennie van Staden	Discovery Health	Coega SEZ tenant	✓	✓
Mr Bheki Mr Zondo	Discovery Health	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr David Pierre-Eugene	Discovery Health	Coega SEZ tenant	✓	✓
Mr Llewelyn Driver	Discovery Health	Coega SEZ tenant	✓	✓
Mr Patrick Barrett	Discovery Health	Coega SEZ tenant	✓	✓
Mrs Tamlyn Anne Ferreira	Discovery Health	Coega SEZ tenant	✓	✓
Mr Arnold Barnard	Famous Brands	Coega SEZ tenant	✓	✓
Ms Gloria January	Famous Brands	Coega SEZ tenant	✓	✓
Mr Johan Engelbrecht	Ibis	Coega SEZ tenant	✓	✓
Mr Bob Gale	Osho SA Cement	Coega SEZ tenant	✓	✓
Mr Herbert Ball	CorroMaster	Coega SEZ tenant	✓	✓
Ms Tarryn Shinn	CorroMaster	Coega SEZ tenant	✓	✓
Hendrick Du Preez	CEMZA	Coega SEZ tenant	✓	✓
Jose Espinosa	GMSA	Coega SEZ tenant	✓	✓
Adri De Meillon	Hella	Coega SEZ tenant	✓	✓
Donovan Theron	Hella	Coega SEZ tenant	✓	✓
Theo Theuner	Hella	Coega SEZ tenant	✓	✓
Philip Pieterse	Hichange Inv Pty Ltd	Coega SEZ tenant	✓	✓
Mariane Van Rooyen	HIMOINSA	Coega SEZ tenant	✓	✓
Martin Foster	HIMOINSA	Coega SEZ tenant	✓	✓
Steven Gottschalk	Holding 302-308 Pmona Pty Ltd	Coega SEZ tenant	✓	✓
Mr Kobus Bernardo	Redefine Properties	Landlord - GM	✓	✓
Coollen Griffith	Parmalat	Coega SEZ tenant	✓	✓
Lynette Barnard	Parmalat	Coega SEZ tenant	✓	✓
Charl De Lange	PE Cold Storage	Coega SEZ tenant	✓	✓
Mr Craig Vaughn	PE Cold Storage	Coega SEZ tenant	✓	✓
Mr George Efstratiou	PE Cold Storage	Coega SEZ tenant	✓	✓
Mr Sean Kelly	PE Cold Storage	Coega SEZ tenant	✓	✓
Mr Johann Schlebusch	Coega Dairy	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr Victor Korsten	Coega Dairy	Coega SEZ tenant	✓	✓
Mr Mark Harris	Coega Dairy	Coega SEZ tenant	✓	✓
Ms Melissa Visser	Coega Dairy	Coega SEZ tenant	✓	✓
Mr Philip Nieman	Coega Dairy	Coega SEZ tenant	✓	✓
Ms Beth Hurr	Isuzu Motors	Coega SEZ tenant	✓	✓
Mr Gareth Woods	Ke Nako Concrete	Coega SEZ tenant	✓	✓
Mr Jerome Perils	Ke Nako Concrete	Coega SEZ tenant	✓	✓
Shaldon Chetty	MSC SEZ	Coega SEZ tenant	✓	✓
Mr Andro Stylianou	National Ship Chandlers	Coega SEZ tenant	✓	✓
Mr George Charalambous	National Ship Chandlers	Coega SEZ tenant	✓	✓
Mr Heinrich Vosloo	Dynamic Commodities	Coega SEZ tenant	✓	✓
Mr Marc Later	Dynamic Commodities	Coega SEZ tenant	✓	✓
Mr Murray Prince	Dynamic Commodities	Coega SEZ tenant	✓	✓
Mr Ben Fouche	BAIC SA	Coega SEZ tenant	✓	✓
Komkulu Schultz	BAIC SA	Coega SEZ tenant	✓	✓
Mr Wayne Poultan	Bosun Brick	Coega SEZ tenant	✓	✓
Ms Ashley Main	FAW	Coega SEZ tenant	✓	✓
Haiyang Yao	FAW	Coega SEZ tenant	✓	✓
Mr Jeremy Staltz	FAW	Coega SEZ tenant	✓	✓
Mr Louis Liu	FAW	Coega SEZ tenant	✓	✓
Andile Qwase	Afrox	Coega SEZ tenant	✓	✓
Dhiroshan Moodley	Agni Steel	Coega SEZ tenant	✓	✓
Hassan Kahn	Agni Steel	Coega SEZ tenant	✓	✓
Sharaz Khan	Agni Steel	Coega SEZ tenant	✓	✓
Mr Karl McLachlan	APM Terminals	Coega SEZ tenant	✓	✓
Mr Len Mulders	Bacarac Foods	Coega SEZ tenant	✓	✓
Mr James Classen	Dedisa Peaking Power	Coega SEZ tenant	✓	✓
Ms Magriet Lombard	Dedisa Peaking Power	Coega SEZ tenant	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr Mark Snyman	NTI	Coega SEZ tenant	✓	✓
Mr Charles Lumsden	Ocean Legacy Marine Engineering	Coega SEZ tenant	✓	✓
Mr Pieter Van Heerden	Ocean Legacy Marine Engineering	Coega SEZ tenant	✓	✓
Jurie Schoeman	Vector Logistics	Coega SEZ tenant	✓	✓
Rudo Stoltenkamp	Vector Logistics	Coega SEZ tenant	✓	✓
Sonia Gunn	Vector Logistics	Coega SEZ tenant	✓	✓
Mr Brian Windsor	WNS	Coega SEZ tenant	✓	✓
Ms Suria Peters	WNS	Coega SEZ tenant	✓	✓
Ms Beverly Brennan	Zacpack / CFR	Coega SEZ tenant	✓	✓
Mr Len Cowley	Zacpack / CFR	Coega SEZ tenant	✓	✓
Mr Hugo Badenhorst	PPC	Risk Manager	✓	✓
Mr Karl Heese	PPC	Risk Manager	✓	✓
Mr Vincent Ntuli	Air Products SA	Coega SEZ tenant	✓	✓
Mr JP van Wyk	Air Products SA	Regional Manager	✓	✓
Mr Sherwin Harris	Engie	Coega SEZ tenant	✓	✓
Ms Seshni Naidoo	Engie	Coega SEZ tenant	✓	✓
Mr Michael Steiner	Engie	Coega SEZ tenant	✓	✓
Mr Christophe Crillon	Engie	Coega SEZ tenant	✓	✓
Mr Tebogo More	Engie Southern Africa	Coega SEZ tenant	✓	✓
Dr Paul Martin	Private	Independent Environmental Control Officer	✓	✓
Ms Jenny Rump	Zwartkops Conservancy	Environmental Manager	✓	✓
Mr Morgan Griffiths	WESSA	Senior Conservation Officer	✓	✓
Dr Chantell Bezuidenhout	EOH Coastal & Environmental Services	Principal Consultant	✓	✓
Dr Mike Cohen	CEN IEM Unit	Principal Consultant	✓	✓
Dr Philip Whittington	East London Museum	Research Associate	✓	✓
Mr Gonzalo Ramirez	Excelerate Energy	Interested Party	✓	✓

Name	Organisation	Capacity	Notified	Registered
Mr Gavin Eales	Glendore Sand & Stone	Interested Party	✓	✓
Mr Bertus van Niekerk	Mulilo Thermal Project Development	Interested Party	✓	✓
Mr Thomas Jachens	AfriCoast	Interested Party	✓	✓
Ms Sherina Shaw	Leads 2 Business	Interested Party	✓	✓
Cllr Nomazulu Mthi	Nelson Mandela Bay Municipality	Ward 53 Councillor	✓	✓
Mr Khaled El-Jabi	Nelson Mandela Bay Ratepayers Association	Ratepayers Association	✓	✓
Mr Johan Potgieter	Nelson Mandela Bay Municipality	Disaster Management	✓	✓
Mrs Joannie Black	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Ms Buyiswa Deliwe	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Mrs Jill Miller	Nelson Mandela Bay Municipality	Environmental Manager	✓	✓
Ms Rosa Blaauw	Nelson Mandela Bay Municipality	Environmental Manager	✓	✓
Mr Sizwe Mvunelwa	Nelson Mandela Bay Municipality	Executive Director: Public Health	✓	✓
Mr Peter Neilson	Nelson Mandela Bay Municipality	Electricity	✓	✓
Mr Barry Martin	Nelson Mandela Bay Municipality	Water & Sanitation	✓	✓
Mr Patric Nodwele	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Mr Anderson Mancotywa	Nelson Mandela Bay Municipality	Fish Water Flats WWTW	✓	✓
Mr Shane Brown	Nelson Mandela Bay Municipality	Director: Disaster Management	✓	✓
Mr Kobus Slabbert	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Mr Patric Nodwele	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Mr Templeton Titima	Nelson Mandela Bay Municipality	Air Pollution & Noise Control	✓	✓
Ms Natasha	Dynamic food	Unkwnown	✓	✓
Mr Thomas Blystad	Blystad Energy	Unknown	✓	✓
Ms Estelle Pillay	L2B	Regional Content Researcher projects	✓	✓
Mr Tim Foxen	Monetgas	Senior Advisor, Monetizing Gas Africa Inc.	✓	✓
Ms Christelle du Plessis	Habitat Link Consulting		✓	✓

Comments and Responses

Comments and responses on the 2016 BID (with subsequent updates to responses) are provided in **Error! Reference source not found.** below, while **Error! Reference source not found.** presents the comments made during the August 2020 ELC meeting, with responses, **Error! Reference source not found.** presents comments and responses on the DSRs for the CDC gas to power project that are applicable to all four applications, and Table 5 presents comments and responses that were specifically made on Gas Infrastructure Power plant application.

Table 2: Comments and Responses for 2016 BID¹

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 22/01/2016 Format: Email Commentator: Thabo Nokoyo (DAFF)	Thank you for copying me the BID. The area has relatively few protected tree species therefore we would like to get more information regarding the project moving forward.	DAFF will be provided with all relevant reports generated as part of the EIA process.
Date Received: 22/01/2016 Format: Email Commentator: Chantel Bezuidenhout	Could you please register me as an I&AP on the on the above mentioned project.	Commentator was registered as IAP
Date Received: 25/01/2016 Format: Registration and comment sheet Commentator: H Badenhorst	Request to be registered as an IAP.	Commentator was registered as IAP
Date Received: 24/01/2016 Format: Email Commentator Paul Martin	CDC is the "applicant" undertaking the EIA and to whom the Authorisation (if granted) will presumably be issued. Which organisation(s) are envisaged to build and operate the facilities (will a build and operate tender type process be followed?).	It is assumed that a procurement process would follow an environmental authorisation. The description of the development is therefore deliberately general in terms of technology providers.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Regular environmental reports / audits / monitoring reports should be submitted to the relevant Regulatory Authorities, CDC, TNPA and the Coega EMC during the life cycle of the project.	Monitoring & reporting requirements will be specified in the Draft EMPr.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Project Alternatives investigated as part of the EIA process should include why three facilities are being considered rather than a phased implementation of one facility. Surely economies of scale dictate that it will be more efficient / cost effective to build one facility in a phased approach? These are presumably base-load stations operating 24/7?	The facilities are proposed as mid-merit power plants. It is envisaged that each facility would bid for an Independent Power Producer license and would be operated by separate legal entities external to the CDC. Three separate power plant applications are proposed so as to allow different developers to bid for and develop each, and avoid the administrative complexities of splitting an authorisation between different developers.

¹ Responses have been updated where relevant to reflect subsequent changed to the project scope and approach.

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	How does the proposed Floating Power Plant & LNG berth fit into the scenario?	The proposed floating power plant is independent of the CDC Gas to Power project. The LNG berth and associated Floating Storage and Regasification Unit were previously part of a separate, but interrelated, EIA process initiated by the Department of Energy. Update: That EIA process has subsequently been halted and these components have been included in the CDC's Gas Infrastructure EIA.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Where does Dedisa Peaking Power Plant fit into the scenario? Will Dedisa also convert to LNG if a LNG terminal is available and could it then become a baseload station?	The Dedisa Peaking Power Plant is not part of the CDC's Gas to Power project, however capacity for supply of gas to Dedisa as a third party off-taker (if required) is included in the gas infrastructure EIA. The availability of cleaner fuel may make it viable to convert Dedisa to gas, but this is outside of the scope of this assessment.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Does the proposed power station location overlap with the Aquaculture Development Zone and other proposed developments (e.g. marine pipeline servitude, WWTW outlet)?	Two gas to power units will be located in Zone 10 which is recognised as the aquaculture cluster. Update: The specific locations of the infrastructure are aligned with the CDC's existing and proposed development proposals (see Figure 6.1 in the FSR).
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Fig 3 of the BID seems to indicate that a pier jetty will be located north of the existing Eastern Breakwater. Will this EIA cover all supporting infrastructure for the power stations (e.g. new berths / jetties), pipelines, seawater inlet / outlet, etc	The scope of this study encompasses the land-based activities associated with the gas to power plant, from the cryogenic pipeline to the Dedisa Power Plant. Update: the scope of the CDC's gas Infrastructure EIA has subsequently been expanded to include all required port infrastructure for import of LNG. Seawater inlet and discharges are however covered under the CDC's separate MPS EIA.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	EIA Specialist Studies and Reports should include the marine environment and SANParks Marine Protected Area. E.g. heated water and pollution risk.	Cooling water from the project will be discharged into the marine pipeline servitude and will adhere to requirements (temperature etc.) that will be specified for discharge into this pipeline. Update: should the marine pipeline servitude not be authorized or developed, air cooling would be the preferred option for the zone 10 power plants. A marine ecological assessment is proposed (see Terms of Reference in Section

Date of comment, format of comment, Commentator	Comment	Response
		6.5.5 of the FSR for the CDC's Gas Infrastructure EIA).
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Port of Ngqura is an important fish area and fish nursery (Matt Dicken studies)	Activities that are likely to impact on the marine environment (berthing facilities and an FSRU) are being assessed via a separate EIA process and are outside the scope of this assessment.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Marine alien invasive organisms, especially invertebrates, mainly hull foulants are dominant in many areas of the Port and are one of the main impacts of the Port that were not adequately addressed in the original Port EIAs and Environmental Authorisations. Increased shipping for the project will lead to more alien invasion risks in the Port, Algoa Bay, proposed marine protected area and - due to the close proximity of the anchorage - St Croix Island group. In light of the 2014 Invasive Species Regulations the EIA needs to indicate how marine alien invasive species will be monitored and controlled / eradicated and this should include the St Croix Island group. The monitoring will need to continue after de-commissioning. It will need to be determined who will be responsible for funding and undertaking this function.	Update: Berthing facilities and an FSRU have subsequently been included in the CDC's gas to power project, and a marine ecological assessment is proposed (see Terms of Reference in Section 6.5.5 of the FSR for the CDC's Gas Infrastructure EIA).
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	The bi-annual water sampling and biomonitoring currently undertaken should be assessed to see if it is adequate for the added risks from this project	Assessment of marine discharges from the marine pipeline servitude is outside the scope of this assessment and falls under the Marine pipeline Servitude EIA. It is anticipated that that EIA process would result in water quality specifications for acceptable discharges to that pipeline, which the Gas to Power project would need to adhere to. It is recognised that coordination between the two studies is required. Update: discharges of heating water for regasification from the FSRU within the port is however within the scope of this project. A marine ecological assessment is proposed (see Terms of Reference in Section 6.5.5 of the FSR for the CDC's Gas Infrastructure EIA).
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Potential impacts on cetaceans (noise, warm water, pollution, increased shipping)	Activities that are likely to impact on the marine environment (berthing facilities, an FSRU, and sea water intake and discharge pipelines) are being assessed via a separate EIA processed and are outside the scope of this assessment. Update: Berthing facilities and an FSRU have subsequently been included in the CDC's gas to power project, and a marine ecological assessment is

Date of comment, format of comment, Commentator	Comment	Response
		proposed (see Terms of Reference in Section 6.5.5 of the FSR for the CDC's Gas Infrastructure EIA).
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Damara Terns (Critically Endangered, rarest SA coastal breeding seabird) that feed in the Port & nest very near to the proposed Z10 facilities	No land-based activities that have the potential to impact on the Damara Tern have been identified and SRK's current view is that no further assessment of bird related impacts is required under the scope of this EIA process. Update: it is understood that this population of Damara tern are in a vulnerable location, not only as a result of the CDC's proposed zone 10 power plants and gas infrastructure, but also other existing and proposed activities in the area. While the breeding area footprint would not be directly impacted by the CDC's gas to power project, it is recognized that noise and other disturbances will affect them. The population is already being monitored as part of another projects, and any mitigation recommendations relevant to the gas to power projects will be included in the EMPr.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Red tide: Will heated water increase the risk? This is already a problem, causing fish kills and workers unable to work due to odours	The seawater discharge pipeline is being assessed via a separate MPS EIA processed and is therefore outside the scope of this assessment.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	The St Croix Island group (largest African Penguin colony in the world) must be considered sensitive receptors (noise, air and lighting). Aspergillosis is arising as a problem in the St Croix penguins	Activities that are likely to impact on the marine environment (berthing facilities, an FSRU, and sea water intake and discharge pipelines) are being assessed via a separate EIA processed and are outside the scope of this assessment. Update: Berthing facilities and an FSRU have subsequently been included in the CDC's gas to power project, and a marine ecological assessment is proposed (see Terms of Reference in Section 6.5.5 of the FSR for the CDC's Gas Infrastructure EIA).
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	The efficient operation of the sand by-pass system must not be compromised	No impacts on the sand bypass system are anticipated. The CDC recognises the need to ensure the jetty and pipeline routes do not impact the sand bypass system negatively.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Existing RoDs / EAs and the mitigating conditions in their EIAs need to be scrutinised and any conflicts with what this EIA is suggesting need to be highlighted, preferably in table form with detailed	To be detailed in the revised Final Scoping Report. Update: EIA listed activities relevant to this project that have already been authorized via

Date of comment, format of comment, Commentator	Comment	Response
	motivation. Relevant EIAs include OTCG, Landside Infrastructure, Marine Infrastructure, Port & Port Extension RoDs, Manganese Project, IDZ RoDs.	separate EIAs are specified in Table 1-1 of the Scoping Report, with appropriate explanations. The relevant mitigation measures will be reviewed and incorporated into the Draft EMPr.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Examples of potential conflicts with mitigations in the 2002 Port EIA: "Disturbance of birds of special concern: No activities are allowed on the eastern breakwater; regular noise and lighting audits are conducted on the port and that lighting near the islands is kept to a minimum"; "Visible plumes are to be disallowed", etc, etc.	Thank you, these will be taken into account as far as possible in the EMPr so as to avoid making recommendations that conflict existing authorisation conditions.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	Air quality assessment must be compatible with the Cumulative Air Quality Model and Monitoring System for the IDZ that CDC maintains	Agreed. This has been communicated to the specialist.
Date Received: 24/01/2016 Format: Email Commentator: Paul Martin	The main excuse for most air pollution pulses are given as abnormal operating conditions (start-up, power failure, etc). The Air Specialist Report must indicate the frequency and consequence of abnormal conditions	This is included in the terms of reference for the air quality specialist study (see Section 6.5.1 of the FSR)
Date Received 24/01/2016 Format: Email Commentator: Paul Martin	How will adequate fire fighting capacity and other emergency services be provided (the area is beyond the current NMBM required response time radius)	SRK will consult with the NMBM Disaster Management to establish any additional firefighting requirements.
Date Received: 22/01/2016 Format: Registration and comment sheet Commentator: Nivashni Govender	None at the moment Want to be registered as an IAP Will comment once DSR is released	Commentator was registered as IAP
Date Received: 25/01/2016 Format: Registration and comment sheet Commentator: AJ Rautenbach	Request to be registered as an IAP.	Commentator was registered as IAP
Date Received: 22/01/2016 Format: Registration and comment sheet Commentator: Chantell Spence	Interested in development and environmental outcome as we are tenants of Coega.	Commentator was registered as IAP
Date Received: 22/01/2016 Format: Registration and comment sheet Commentator: Kobus Bernado	We just would like to be kept informed.	Commentator was registered as IAP
Date Received: 15/02/2016 Format: Registration and comment sheet Commentator: Alan Southwood (DEDEAT)	We would appreciate one hard copy for commentary purposes	Update: Due to DEDEAT PE offices not being fully open to accept hard copies at the time of distribution of the DSR due to covid, electronic copies were made available to the relevant officials for comment.
Date Received: 19/02/2016	My primary concern is the close proximity to the breeding areas of the	No land-based activities that have the potential to impact on the

Date of comment, format of comment, Commentator	Comment	Response
Format: Registration and comment sheet Commentator: Dr Philip Whittington	Damara Tern. This species is considered to be critically endangered in the 2015 Red Data Birds for South Africa, Lesotho and Swaziland and a larger proportion of the population breeds in the vicinity of the Coega and east of the Sundays River mouth.	Damara Tern have been identified and SRK's current view is that no further assessment of bird related impacts is required under the scope of this EIA process. Update: it is understood that this population of Damara tern are in a vulnerable location, not only as a result of the CDC's proposed zone 10 power plants and gas infrastructure, but also other existing and proposed activities in the area. While the breeding area footprint would not be directly impacted by the CDC's gas to power project, it is recognized that noise and other disturbances will affect them. The population is already being monitored as part of another projects, and any mitigation recommendations relevant to the gas to power projects will be included in the EMPr
Date Received: 22/02/2016 Format: Comment and response sheet Commentator: Kobus Slabbert	Activity No.28, listed in GN 984 (listing notice 2) of the NEMA 2014 EIA regulations will be triggered an AEL will be required for the proposed plant. The Nelson Mandela Bay Municipality (NMBM) is the licensing authority for issuing of an atmospheric emission license. The following specialist studies are proposed for the EIA phase of the proposed project: air quality assessment and noise assessment.	An AEL application is to be lodged with the NMBM A Noise Impact Assessment is proposed as part of the Plan of Study for the EIA.
Date Received: 07/03/2016 Format: Comment and response sheet Commentator: JP Van Wyk	We are a large power consumer in the Coega IDZ zone. Any issues on Power would be concerning to us as this our own main resource other than any possible impacts on emissions there would also be a concern to us.	An air quality study is proposed (see Terms of Reference in Section 6.5.1 of the FSRs), and will provide predictions regarding emissions from the project.
Date Received: 03/10/2016 Format: Comment and response sheet Commentator: Gonzalo Ramirez	We are just interested in the LNG berth and FSRV project	Commentator was registered as IAP
Date Received: 11/03/2016 Format: Email Commentator Gavin Eales	Please register me as an IAP for the above mentioned project. Please send me the BID and any other publicly available documents.	Commentator was registered as IAP. IAP was provided with a copy of the BID.
Date Received: 22/04/2016 Format: Comment and response sheet Commentator: Bertus van Niekerk		Commentator was registered as IAP
Date Received: 25/01/2016 Format: Email Commentator: Hugo Badenhorst	Thanks for informing me, can I please ask that you also include Mr K Heese also from PPC.	Commentator was registered as IAP

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 11/07/2016 Format: Comment and response sheet Commentator Tebogo More		Commentator was registered as IAP
Date Received: 09/03/2016 Format: Email Commentator: Sherina Shawe	Please may I be added to the I&AP for this project and if any reports have been conducted, please can you send them to me or send me a link	Commentator was registered as IAP

Table 3: Comments Raised by Stakeholders at the Coega ELC Meeting of 20 August 2020

Commentator	Comments raised	Response (SRK, unless specified otherwise)
Comments relating to the process		
DEFF Wayne Hector	The Public Participation Plan must be approved by the DEFF before the EIA applications are submitted.	SRK is in the process of drafting the plan for submission to DEFF prior to the application forms, should this still be required under the current lockdown regulations.
DEFF Millicent Solomons	Considering that four separate application are being made, ensure that the public participation process is flawless.	The PPP has been discussed during the pre-application meeting, where DEFF outlined their expectations in this regard.
Comments relating to infrastructure		
TNPA Renee de Klerk	Has TNPA been consulted wrt the siting of the infrastructure inside the Port of Ngqura?	[CDC] The prefeasibility studies for the project were conducted in conjunction with TNPA and a letter of support from TNPA for the gas to power EIA process was received.
TNPA Renee de Klerk	Who will be responsible for providing the new jetty and loading platform?	The successful bidder / developer / operator for the gas infrastructure component of the work package, which has not yet been awarded, will be responsible for development of the new jetty and loading platform.
TNPA Renee de Klerk	Who will be responsible for the LNG terminal operations?	The successful bidder / developer / operator for the gas infrastructure component of the work package, which has not yet been awarded, will be responsible for the operations.
TNPA Renee de Klerk	Although the Port of Ngqura ROD states that no activities and/or infrastructure are allowed on the eastern breakwater, the EAP must consider the reasons for the restriction	It is SRK's understanding that the reasons for this restriction are both to ensure structural integrity of the breakwater is not compromised, and to prevent possible risk of rodents from ships and associated activities invading the nearby Jahleel island, putting the local bird breeding populations at risk.

Commentator	Comments raised	Response (SRK, unless specified otherwise)
TNPA Renee de Klerk	Consider the impact of off-loading LNG vessels on current and future Port operations.	The 2016 Prefeasibility study by PRDW took this into account. CDC has confirmed that the future development potential of the port was considered during compilation of the layout of the terminal in the prefeasibility study.
TNPA Renee de Klerk	Consider the impact on the sand bypass system	No impacts on the sand bypass system are anticipated. The CDC recognises the need to ensure the jetty and pipeline routes do not impact the sand bypass system negatively.
TNPA Renee de Klerk	Consider HAZOP Risk Assessment and liquid bulk operations	Riscom (MHI Specialist) has confirmed that a HAZOP study should be undertaken. The timing of this would typically be after the EIA, once the required detailed engineering drawings are available, but before construction phase.
Comments relating to Climate Change		
DEDEAT Lyndon Mardon	The Terms of Reference (TOR) for the Climate Change Impact Assessment must consider RSA's commitment to a peak, plateau and decline scenario	Promethium (The Climate Change Specialist) have confirmed that peak, plateau and decline scenario is not a climate scenario, but rather an emissions reduction trajectory envisioned for South Africa as part of our Nationally Determined Contribution to the UNCCC. They do however make use the IPCC's RCP scenarios as part of the climate change study.
DEDEAT Lyndon Mardon	The Climate Change Impact Assessment must look at the impact of climate change on this project and vice versa, the impact of this project on climate change.	This will be assessed by Promethium in their climate change assessment.
DEDEAT Lyndon Mardon	From a planning perspective, the EIA must consider RSA's commitment to the management of GHG emissions and climate change adaptation and whether this project will meet the GHG emissions trajectory after mitigation. South Africa communicates, as defined in national policy, a peak, plateau and decline GHG emissions trajectory range, with emissions by 2025 and 2030 in a specified range	[Promethium (climate change specialist)] We have considered South Africa's peak, plateau and decline (PPD) scenario as well as the South African Carbon budget in our assessment for the project. The current EIA regulations and impact assessment methodology does not consider climate change, nor is it a fit for purpose method in assessing/determining climate change impacts. The methodology proposed to determine magnitude is based on two fundamental principles: 1) The remaining South African Carbon budget based on the most recent publicly available information and 2) the scale of emissions in terms of contributing to the use of this budget, considering South Africa's NDC,

Commentator	Comments raised	Response (SRK, unless specified otherwise)
		our PPD trajectory and the commitments/recommendations set out in the Paris Agreement. These fundamental principles and the increasing pressure to achieve a global 1.5°C target informed the quantification of project contributions in terms of a localised carbon budget.
Comments relating to LNG gas		
DEDEAT Lyndon Mardon	What are the chemical constituents of the LNG gas that will be used? That has an implication in terms of the control equipment that would go into the power station, etc. and what happens with those pollutants i.e. where is the effluent going to go.	[CDC] the LNG will be a mixture primarily of methane (approximately 85%), ethane (approximately 10%), and propane (approximately 3%) with butane, carbon dioxide, hydrogen sulphide, nitrogen and oxygen comprising the balance.
Comments relating to Alternatives		
DEFF Milicent Solomons	With reference to the consideration of alternatives, ensure that it is understood that only the preferred alternative will be authorised.	SRK and the CDC do understand this. The DSR aims to adequately cover the options potential developers may require as part of the preferred alternative that is presented for authorisation.
DEFF Milicent Solomons	Are you only considering LNG or are you looking at any other technology type for these applications?	Only LNG is being considered as a long term fuel source for the gas to power plants, however there is a possibility that a transitional HFO-fuelled phase (covering the first 2-3 years of operation) will be required should the supporting infrastructure for gas not yet be operational. No other types of power generation technology are being considered for this application.
Comments relating to bidding process		
DEFF Milicent Solomons	What is the bidding process referred to in the presentation? Additionally, what is the bidding process to be followed by the CDC? Does the CDC intend to be ready to bid for the Risk Mitigation bid to be advertised in Nov '20?	[CDC] It refers to the IPP process where the Department of Energy will go out on the tender process to get bidders for the power plants. The CDC does not currently plan on bidding for the Risk Mitigation bid as yet, however are considering this as an option.

Table 4: Comments and Responses on the Draft Scoping Report for CDC Gas to Power Project (specific application not noted and therefore assumed to apply to all four applications)

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 09/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries:	The Final Scoping Report & Plan Study must also include the following as guidelines considered and ensure that the proposed project is in compliance with their requirements:	The following biodiversity plans are relevant to the site locations and are considered in Chapter 3 of the Final Scoping Report:

Date of comment, format of comment, Commentator	Comment	Response
Directorate: Biodiversity Conservation	<ul style="list-style-type: none"> All relevant provincial biodiversity plans; 	<ul style="list-style-type: none"> Mucina & Rutherford vegetation types (2006); NMBM Bioregional Plan; and the Coega Open Space Management Plan (OSMP). <p>The Coega OSMP considered the draft version of the NMBM Bioregional plan and is consistent with the Final Bioregional Plan.</p> <p>The Eastern Cape Biodiversity and Conservation Plan identifies the project site as a Critical Biodiversity Area. However, authorisation for the transformation of the site has previously been granted and the development of the site is consistent with the finer scale Coega OSMP and NMBM Bioregional Plan.</p>
	<ul style="list-style-type: none"> NEMBA National List of Threatened Ecosystem that are threatened and in need of protection; 	<p>The National List of Threatened Ecosystems (SANBI BGIS, accessed 17/11/2020) does not identify any threatened ecosystems on the project site or in close proximity to the project site. The closest threatened ecosystem is Albany Alluvial Vegetation associated with the Coega River, north of the N2.</p>
	<ul style="list-style-type: none"> Draft Species Environmental Assessment guideline; 	<p>No specialist studies requiring the assessment of specific species have been identified during the scoping study and consequently these guidelines will not be applicable in this instance.</p> <p>While a number of species of special concern are likely to be present in and around the project area, these have largely been documented already via other projects in the area and it is proposed that relevant management measures to protect these species are included in the EMPr.</p>
	<ul style="list-style-type: none"> National Climate Change Adaption Strategy Version UE110, 13 November 2019; and 	<p>Consideration of the National Climate Change Adaptation Strategy has been included in Chapter 1 of the FSR.</p>
	<ul style="list-style-type: none"> The site locality maps illustrating the ecological sensitivity, Open Space Management Plan (OSMP), and different alternatives. 	<p>A map of ecological sensitivity (Figure 3.7) and the OSMP is included.</p>
Date Received: 09/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries: Directorate: Biodiversity Conservation	<ul style="list-style-type: none"> The Coega Open Space Management Plan, which outline management process for the critically endangered <i>Ledebouria coriacea</i> must be submitted during the final scoping phase. 	<p>The Coega OSMP has been incorporated into the sensitivity map provided (Figure 3.7). The CDC is liaising with SANBI regarding the recent discovery of <i>Ledebouria coriacea</i> in the zone 10 area and how best to protect the population. Management measures, including</p>

Date of comment, format of comment, Commentator	Comment	Response
		search and rescue of all individuals within the project footprint area by a qualified specialist, and any other measures recommended by SANBI, will be included in the EMPr.
Date Received: 09/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries: Directorate: Biodiversity Conservation	The final report must also assess the cumulative impacts also attach the cumulative map showing existing industrial developments since the area is zoned an industrial area.	The Scoping Report includes a map of surrounding land uses in the immediate vicinity of the site (Figure 6.1). Cumulative impacts will be assessed by the various specialists during the Impact Assessment phase of the project. In terms of biodiversity, as the transformation of the site (and the broader SEZ) is already authorised, no assessment of the cumulative impact of the loss of biodiversity on this site is proposed.
Date Received: 09/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries: Directorate: Biodiversity Conservation	In order to minimize loss of biodiversity the final report including specialist studies must clearly describe how different stages of the mitigation hierarchy was applied.	It is noted that transformation of the site has already been authorised as part of the authorisation for the broader SEZ, and therefore clearing of vegetation is not specifically applied for as a listed activity and will not be assessed as part of this EIA. Mitigation measures to minimise biodiversity loss and to manage species of special concern that may be present on the site will however be included in the EMPr.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	It is concerning that the documentation references this as an overall Coega Power Project with the different components being interlinked. Yet there are three separate applications and furthermore the LNG to Gas Hub is not addressed at all.	The LNG and Gas Hub is included in the Gas Infrastructure DSR, and the interlinkages between the separate applications are described in Section 1.1 of the FSRs
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	The seemingly generic nature of the assessment process is also concerning – this is due to the fact that there are no specific details available as to the specifics of the powerplants.	The approach to the assessment is such that a number of technology options are applied for to accommodate various development options that may be proposed by future developers, provided these options fall within the parameters of what is being assessed in the EIA.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	The location of two of the powerplants immediately adjacent to coast and within the littoral active zone is problematic. There should have been alternative locations identified for these.	[CDC] Site location was considered based on the lowest elevation which is an economical viable option, topography and geological conditions were assessed in determining the locations of the site. The CDC approved Development Framework Plan Rev 1 2006, the Coega East Master plan and the open space management plan and criteria for both economical and functional gas to power plant were used to assess and identify the most

Date of comment, format of comment, Commentator	Comment	Response
		<p>suitable locations within the SEZ for the projects.</p> <p>Criteria that were used include: industrial symbiosis between power plant and potential aquaculture facilities; close proximity to the port; corridor for evacuation of electricity, elevation; gas supply as well as seawater accessibility for cooling.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>There are a lot of assumptions and uncertainties due to the fact that this project is seemingly dependent on the outcome of other assessments and applications notably the marine intake and outfall project and the gas infrastructure project.</p>	<p>The two zone 10 power plants and the onshore regasification system (part of the gas infrastructure DSR) are dependent on the marine pipeline servitude for cooling and heating water respectively, however options (notably, air cooling and use of FSRUs are provided for in the absence of the MPS. The three power plants are dependent on the gas infrastructure project unless gas can be provided to the power plant in another way, or another fuel is used (as is proposed for the initial phase of operation of the zone 13 power plant.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>The details with regard to the water situation seems to be based on old information. Furthermore the whole issue of water use / demand and supply is not properly addressed / explained. The Nelson Mandela Bay is severely constraint when it comes to water and with climate change it is foreseen that it will stay this way. Use of potable water from the municipal supply system for industrial use should not even be considered as it is not sustainable- yet all three Scoping Reports references the possibility municipal supply. Unless the source of such supply is return effluent it should not be considered as an option. Furthermore it is mentioned that desalinated water will be obtained from the desalination plant associated with the aquaculture project. This is meaningless without actually explaining in detail the proposed demand and supply i.e. what is the capacity of this desalination plant and will it be able to provide in the anticipated demand for all three proposed powerplants. If seawater is to be used such as being proposed for the two powerplants in Zone 10, again the volumes needs to be explained in the context of the proposed capacity of the marine intake bearing in mind that this intake will not only be there to supply the three powerplants.</p>	<p>[CDC] In line with the industrial development within the SEZ, the CDC has considered different options for water supply. The following were considered, desalination facilities, waste water treatment plants, as well as a return effluent scheme.</p> <p>[SRK] the section describing the existing water situation in NMBM has been updated as far as possible. It is agreed that the drought situation in the NMBM is a concern and other sources of process water supply are being sought. The use of desalinated water (from the authorised desalination plant in zone 10) for process water supply is proposed as another option should municipal water not be available for the development..</p>
<p>Date Received: 11/11/2020</p>	<p>It is evident from statements in the three scoping reports that no carbon</p>	<p>This is under consideration and the Climate change specialist has been</p>

Date of comment, format of comment, Commentator	Comment	Response
Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	capture and storage is proposed for the bigger project. The question is why this is not considered as one would have thought it should be considered. Furthermore it this would be a requirement how will it influence the viability of the project.	asked to comment on this and the cost implications thereof in their assessment.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	The comments and response report references comments made on a BID that dates from 2016. One would have thought that there would be an up to date BID circulated that would be more relevant. As such comments and responses contained in the comments and response report that relate to the BID is old and out of date.	Responses to comments made on the 2016 BID have been updated where required. See Table 2.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South, Page 1, Paragraph 1 It is the understanding of the Department that it is not actually the CDC that will do the development but that it will be a third party (private) entity. This creates obvious implications for the proper assessment of the project as the CDC is seemingly seeking a generic EA that can be adapted / changed to suit whoever will eventually build / operate the power plant.	[CDC] Yes the CDC will not be the developer of the power plant, however the EA will be transferred to the relevant developer. Options will be assessed accordingly within each proposed technology.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South, Page 1, Paragraph 2, point 2 Does this imply that the three are interlinked and interrelated and dependent on each other? Why has this been split into three different applications - all three projects will be dependent on the LNG Terminal / LNG Gas Hub. Which application actually includes / addresses this Gas Hub?	The LNG and Gas Hub is included in the Gas Infrastructure DSR, and the interlinkages between the separate applications are described in Section 1.1 of the FSRs. Three separate power plant applications are proposed so as to allow different developers to bid for and develop each, and avoid the administrative complexities of splitting an authorisation between different developers.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South, Page 1, Paragraph 3 As per comment above would each individual component be financially viable in its own right or not. If not, why then three different applications. The terminology used talk about a overall project; full extent of the project etc which all seems to imply that this one project - it therefore is confusing that there are three different applications for one project.	[CDC] Each component will be financially viable in its own right, in line with the Gas to power procurement program. [SRK] the interlinkages between the separate applications making up the gas to power project are described in Section 1.1 of the FSRs.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South, Page 1, Paragraph 3 This in itself is problematic as previously mentioned. Different entities will have different needs and	The approach to the assessment is such that a number of technology options are applied for to accommodate various development options that may be proposed by future developers, provided these

Date of comment, format of comment, Commentator	Comment	Response
	ideas and how do you take this into account without knowing these details.	options fall within the parameters of what is being assessed in the EIA.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South, Page 1, Paragraph 4 This is even more confusing - how does this relate / fit in with this project and the three applications.	The interim phase of operation using liquid fuel or LNG that is stored and regasified on-site is proposed for the zone 13 power plant only, to allow for operation prior to the availability of piped gas to the site.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South, Page 1, Paragraph 5 This again is problematic as it assumes that each one will be able to operate without the other. What would happen if an EA is issued for this (zone 13) application but the gas hub infrastructure is not authorised. One cannot divorce these components from each other and one thus should not be dealing with it as separate applications.	The LNG and Gas Hub is included in the Gas Infrastructure DSR, and the interlinkages between the separate applications are described in Section 1.1 of the FSRs. Four separate applications are proposed for the CDC's overall gas to power project so as to allow different developers to bid for and develop each, and avoid the administrative complexities of splitting an authorisation between different developers.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South, Page 1, Paragraph 6 Please explain how this will work. It is not a given that the worst case for all impacts will consistently be associated with one specific technology. Worst cases for different impacts may be associated with different technologies. It would be better to assess the different technologies against each other and then make recommendations with regard to the preferred technology when all factors are considered.	It is agreed that the worst case impacts may not consistently be associated with the same technology, and for this reason the assessment will be based on whichever particular technology results in the worst case for the specific impact being assessed, which may well vary between impacts. The aim of the assessment is to come up with acceptable impact limits, with which the selected technology would have to comply. It is recognised that different mitigation measures may be applicable to different technologies and where this is the case it will be specified.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 3, Figure 1-1 Again the wording here suggest that this is indeed one interrelated project that should be dealt with as one application.	Four separate applications are proposed for the CDC's overall gas to power project so as to allow different developers to bid for and develop each, and avoid the administrative complexities of splitting an authorisation between different developers.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 5, Figure 1-3 The background for the legend does not work as it hides the colour chosen for the services corridor.	SRK has attempted to provide clearer maps in the FSRs.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 7, Box 1 This is an interesting statement as it is obvious that the project in itself will definitely result in degradation or pollution and that such would not be able to be prevented. Hopefully it	It is agreed that the project will inevitably result in a level of degradation and pollution. The magnitude of this, and to what extent it can be prevented or managed will be addressed in the EIR.

Date of comment, format of comment, Commentator	Comment	Response
	can be minimised but not prevented altogether.	
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 7, paragraph 3, point 1 Also within stipulated timeframes.	Agreed.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 7, paragraph 3, point 5 The draft EMPr are actually supposed to be attached to the EIR.	Agreed, this will provided with the Draft EIR.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 8, Table 1-1 Description of listed activity R327 Activity 27 Is this relevant to each one of the three powerplants or would there be one facility to serve all three?	On-site demineralisation facilities are proposed for each power plant.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 9, Table 1-1 Description of listed activity R325 Activity 4 Again the question is whether this is for each one of the powerplants or is it a shared facility between the three powerplants.	The fuel storage capacity applied for is for each power plant, and will be situated on the power plant site.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 10, Box 1 And what about the activities listed above that are in GN R327?	Reference to GN R 327 has been added.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 10, Box 2 Has it been confirmed that this is acceptable. One of the primary listed activities relates to a permit required for the air emissions i.e. The development of facilities or infrastructure for any process or activity which requires a permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent. How can this be properly assessed within the technical information being available?	The air quality specialist has confirmed that the AEL application forms part of the EA process. Construction and commissioning cannot proceed without an AEL. In most cases a Provisional AEL will be awarded initially with a condition that application to full AEL must be done within 12 months of commissioning. The PAEL will then cover the construction and commissioning period. Conditions in the PAEL will be to show actual data which will also inform the conversion to an AEL, such as stack monitoring results. All the information required for the application is included in the AIR, so it can be done.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North and Zone 10 South Page 11, Box 1 It is important that this should be considered in terms of the provincial climate response strategy as well as the provincial GHG inventory.	This has been communicated to the climate change specialist to include in their assessment, see ToR in Section 6.5.

Date of comment, format of comment, Commentator	Comment	Response
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North and Zone 10 South Page 11, item 1.5.6 Noted that the other two projects will involve discharge of cooling water into the sea (at least it seems that this is planned). How / where will cooling water from this plant be discharged. How will seawater be brought to the site - unless of course the demineralisation plant referred to is one facility that will serve all three powerplants.</p>	<p>Cooling water for the zone 10 power plants (should seawater cooling be authorised) would be sourced from the seawater intake point in the Port of Ngqura, which is covered under the MPS EIA. The seawater intake pipeline is included in the Gas Infrastructure EIA.. Demineralisation of water for process purposes will take place on site at each power plant.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North Page 12, Box 1 and Zone 10 South Page 11, Box 1 Can it be confirmed that none of the project components (that is the overall project) will be located within or impact on any of the open spaces as per the Coega OSMP?</p>	<p>Refer to the environmental sensitivity map (Figure 3.7) in the FSR. No project components overlap with Coega OSMP areas, however part of the Zone 10 North power plant site overlaps with an ecological support area in which the services corridor runs.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 13. Box 2 and Zone 10 South Page 12, Box 2 Assume that the impacts of the development on the wetland will be properly assessed.</p>	<p>No wetlands are located in or close to the gas infrastructure sites. A WULA will be required for the zone 13 power plant due to its proximity to a wetland.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 13. Paragraph 5 and Zone 10 South Page 13, Paragraph 3 If this is the case why does this project even consider OCGT as a technology?</p>	<p>[CDC] The various technologies are proposed in order to open a window for all potential bidders to participate in the gas to power program</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 16. Paragraph 3 and Zone 10 South Page 16, Paragraph 1 It seems obvious that the actual details are not readily available and that the assessment would be rather generic in nature instead of assessing an actual firm project proposal.</p>	<p>The approach to the assessment is such that a number of technology options are applied for to accommodate various development options that may be proposed by future developers, provided these options fall within the parameters of what is being assessed in the EIA.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 18. Paragraph 2, point 1 and Zone 10 South Page 16, Paragraph 4, point 1 This is problematic as it is apparent / obvious that the assessment of impacts and mitigation is dependent on this information being available. This is especially relevant in assessing different technologies with each other that may have different levels of impacts.</p>	<p>The approach to the assessment is such that a number of technology options are applied for to accommodate various development options that may be proposed by future developers, provided these options fall within the parameters of what is being assessed in the EIA.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 18. Paragraph 2, point 1 and Zone 10 South Page 16, Paragraph 4, point 1 This project / application is not about broad land uses but for a project that deals specifically with electricity</p>	<p>That is correct.</p>

Date of comment, format of comment, Commentator	Comment	Response
	generation within the context of an area already set aside for industrial use.	
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 18. Paragraph 2, point 3 and Zone 10 South Page 16, Paragraph 4, point 3 This is also problematic. Please explain how this will work. It is not a given that the worst case for all impacts will consistently be associated with one specific technology. Worst cases for different impacts may be associated with different technologies. It would be better to assess the different technologies against each other and then make recommendations with regard to the preferred technology when all factors are considered.</p>	<p>It is agreed that the worst case impacts may not consistently be associated with the same technology, and for this reason the assessment will be based on whichever particular technology results in the worst case for the specific impact being assessed, which may well vary between impacts. The aim of the assessment is to come up with acceptable impact limits, with which the selected technology would have to comply. It is recognised that different mitigation measures may be applicable to different technologies and where this is the case it will be specified.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 22. Paragraph 2, Zone 10 South Page 21, Paragraph 2 It is put forward that this study should then assess the various technologies against each other and make recommendations with regard to which one will be best for the circumstances.</p>	<p>The approach to the assessment is such that a number of technology options are applied for to accommodate various development options that may be proposed by future developers, provided these options fall within the parameters of what is being assessed in the EIA.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 22. Paragraph 2, Zone 10 South Page 21, Paragraph 2 This may possibly work if you are comparing apples with apples i.e. different types of CCGT vs CCGT and not CCGT vs OCGT.</p>	<p>[CDC] Various technologies may have different design parameters. [SRK] it is understood that the various technologies will fit within the boundaries of the site layout provided.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 22. Paragraph 3, Zone 10 South Page 21, Paragraph 3 It is assumed that the various technologies in itself may have different specific design information.</p>	
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 22. Paragraph 4, Zone 10 South Page 21, Paragraph 4 This is the problem - see previous comments in this regard.</p>	<p>It is agreed that the worst case impacts may not consistently be associated with the same technology, and for this reason the assessment will be based on whichever particular technology results in the worst case for the specific impact being assessed, which may well vary between impacts. The aim of the assessment is to come up with acceptable impact limits, with which the selected technology would have to comply. It is recognise that different mitigation measures may be applicable to different technologies and where this is the case it will be specified.</p>

Date of comment, format of comment, Commentator	Comment	Response
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 22. Paragraph 4, Zone 10 South Page 21, Paragraph 4 It would be much better to rather assess the different technologies against each other.</p>	<p>The approach to the assessment is such that a number of technology options are applied for to accommodate various development options that may be proposed by future developers, provided these options fall within the parameters of what is being assessed in the EIA.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 23. Paragraph 2, Zone 10 South Page 22, Paragraph 2 What is the relevance of this in the context of this project as it seems to speak to something completely different.</p>	<p>This application is intended to be used by potential bidders for the RMIPPPP, provided their projects fall within the scope of this assessment. The smaller, liquid fuel or on-site LNG storage and regasification based initial phase proposed for the zone 13 power plant is intended to accommodate such developers.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 24, Table 2-1, World class site location, point 5 and Zone 10 South Page 23, Table 2-1, World class site location point 5 Is this even still relevant at this point in time.</p>	<p>Should shale gas extraction in the eastern cape become a reality in the future, this would be relevant in terms of strategic integration.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 24, Table 2-1, progress on environmental authorisation, point 4 and Zone 10 South Page 23, Table 2-1, progress on environmental authorisation point 4 This application was refused at the Scoping Stage.</p>	<p>This is recognised however CDC has re-submitted the application and is of the hope that the MPS will still be authorised in future. Options to allow for the gas to power project to operate in the absence of the MPS are however provided.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 25, Table 2-1, and Zone 10 South Page 24, Table 2-1 The LNG gas hub does not feature anywhere yet. How is that linked to the three proposed powerplants and does it not require an EA in its own right?</p>	<p>The LNG and Gas Hub is included in the CDC's Gas Infrastructure application and will require EA. It will be required for onshore storage and regasification (phase 2 of the gas infrastructure development). Interlinkages between the projects are described in Section 1.1.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 26, paragraph 6, and Zone 10 South Page 25, paragraph 6 This is not disputed – however it should then be possible to properly assess the impacts of the project and this may be very difficult given the “generic” nature of the assessment.</p>	<p>A range of technology options will be accommodated in the assessment to allow for various options that may be presented by developers.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 27, paragraph 1, and Zone 10 South Page 25, paragraph 8 Can you not only arrive at this when you have the specifics / details of the project or if you actually compare different technologies with each other.</p>	<p>It is agreed that would be the most practical way to arrive at this. The approach proposed for this EIA (and agreed with DEFF during pre-application meetings) is that various technology options</p>

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 27, paragraph 2, and Zone 10 South Page 26, paragraph 1 Inclusive of technology alternatives.	Where possible, technology alternatives are provided for, however for the most part the approach to the EIA is to assess the technologies as options rather than alternatives. This approach was discussed and agreed to with DEFF during pre-application meetings.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 27, paragraph 6, and Zone 10 South Page 26, paragraph 5 Assumed that this will be quantified.	Refer to Figure 2.2 for indicative comparison of GHG emissions between coal and natural gas power generation
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 32 and Zone 10 South Page 31 Seems that this SR lacks the further explanation of differences between the cooling technologies as per the other two reports.	Additional details on the various cooling technologies has been provided in the power plant FSRs. This is not directly relevant to the gas infrastructure.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 33, section 2.5 and Zone 10 South Page 32, section 2.5 This is actually what should be assessed i.e the technology alternatives should be assessed against each other in to determine which technology would be the most suitable given the specific circumstances and environmental parameters / constraints applicable.	Where possible, technology alternatives are provided for, however for the most part the approach to the EIA is to assess the technologies as options rather than alternatives. This approach was discussed and agreed to with DEFF during pre-application meetings.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 33, section 2.5.1 and Zone 10 South Page 32, section 2.5.1 See previous comment.	
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 35, section 2.5.2 and Zone 10 South Page 34, section 2.5.2 Why?	This comment is not relevant to the gas infrastructure report
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 36, section 2.5.3, point 2 and Zone 10 South Page 35, section 2.5.3, point 2 If this is case why can the other two powerplants not also be located in close proximity to this powerplant?	This comment is not relevant to the gas infrastructure report
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 37, section 2.5.7 and Zone 10 South Page 36, section 2.5.7 Alternatives for discharge if not via a marine outfall pipeline.	[CDC] process water will be discharged to a WWTW
Date Received: 11/11/2020 Format: Email	Zone 10 North, Page 37, section 2.5.8 and Zone 10 South Page 36, section 2.5.8	[CDC] CDC will comply with its stormwater masterplan standards that is 1:100 flood event.

Date of comment, format of comment, Commentator	Comment	Response
Commentator: Department of Economic Development, Environmental Affairs and Tourism	Assume that stormwater attenuation on site will accommodate a 1:100 year flood event.	
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 39, paragraph 2 and Zone 10 South Page 38, paragraph 2 This contradicts earlier statements about the fact that detailed design are not available.	Alternatives have been taken into account at conceptual / planning stage of the project. Detailed designs are not available for the project.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 39, paragraph 5 and Zone 10 South Page 38, paragraph 5 This site is not within the Port but within Zone 13 of the SEZ.	This has been corrected in the FSR
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 40, paragraph 4 and Zone 10 South Page 39, paragraph 4 This implies that the other two plants could also be located in close proximity to this plant.	[CDC] Other considerations were proximity to fuel source, proximity to port, cooling options, industrial symbiosis with potential aquaculture facilities.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 40, section 2.6.3 and Zone 10 South Page 39, section 2.6.3 The layout provided is not readily legible.	Updated layout drawings with legible labels are provided in Appendix I
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 40, section 2.6.4 and Zone 10 South Page 39, section 2.6.4 This is problematic as it limit the assessment process to a rather generic process. See other comments in this regard.	The approach to the assessment is such that a number of technology options are applied for to accommodate various development options that may be proposed by future developers, provided these options fall within the parameters of what is being assessed in the EIA. This approach was discussed and agreed to with DEFF during pre-application meetings.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 40, section 2.6.4 and Zone 10 South Page 39, section 2.6.4 The worst case scenario concept has already been commented on.	It is agreed that the worst case impacts may not consistently be associated with the same technology, and for this reason the assessment will be based on whichever particular technology results in the worst case for the specific impact being assessed, which may well vary between impacts. The aim of the assessment is to come up with acceptable impact limits, with which the selected technology would have to comply. It is recognise that different mitigation measures may be applicable to different technologies and where this is the case it will be specified.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 40, section 2.6.4 and Zone 10 South Page 39, section 2.6.4 This argument is flawed as previously explained.	The approach to the EIA and in particular the worst case scenario is explained above.

Date of comment, format of comment, Commentator	Comment	Response
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 41, section 2.6.5 and Zone 10 South Page 40, section 2.6.5 It should be made clear whether the no-go alternative applies to the project as a whole or to the individual powerplants on their own.</p>	<p>The no-go alternative applies to the individual power plants / applications. Additional clarity on this has been provided in the FSR.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 42, section 2.6.7, paragraph 4 and Zone 10 South Page 41, section 2.6.7, paragraph 4 How is this addressed in the context of the three powerplant applications? Assume that this refer to the LNG gas hub infrastructure. It is not understood how these projects can be considered in the absence of such.</p>	<p>The LNG and Gas Hub is included in the Gas Infrastructure DSR, and the interlinkages between the separate applications are described in Section 1.1 of the FSRs. Only the zone 13 power plant application includes an initial liquid fuelled phase, or onsite LNG storage and regasification, to accommodate operation in the absence of gas supply infrastructure, which includes the gas and LNG pipelines, FSRU, and LNG and Gas hub. Regasification will initially take place at the FSRU and the power plants could therefore operate to a certain capacity prior to development of the LNG and gas hub, which will replace the FSRU as phase 2 of the gas infrastructure development.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North and Zone 10 South, Page 55, section 3.9 Whether people want to hear this or not, this is a limiting factor to any large scale development unless the water demand of such development can be met via an alternative source.</p>	<p>[CDC] In line with the industrial development within the SEZ, the CDC has considered different options for water supply. The following were considered, desalination facilities, waste water treatment plants, as well as a return effluent scheme. [SRK] the use of desalinated water (from the authorised desalination plant in zone 10) for process water supply is proposed as another option should municipal water not be available for the development.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 58, and Zone 10 South, Page 57, section 3.11, paragraph 3 The issue is not whether exceedance of the national ambient standard is shown, but rather how much cumulative airspace is left before the standard will be exceeded.</p>	<p>The air quality specialist has confirmed that ambient concentrations are currently relatively low and well below the NAAQS, and the maximum contribution to ambient concentrations from the project is very small. The implication by NAAQS not being exceeded is that there is ample airspace before the standards are exceeded.</p>
<p>Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism</p>	<p>Zone 10 North, Page 58, and Zone 10 South, Page 57, section 3.11, paragraph 3 It is also obvious that there would be marked increase in PM10 levels when large construction projects are underway, especially if high winds are encountered - case in point is the BAIC site.</p>	<p>The air quality specialist has confirmed that there may be an increase in ambient PM₁₀ concentrations as a result of the construction of large projects, particularly in high winds. Particulates from construction activities are generally relatively coarse, but may contain some PM₁₀. Emphasis must be made in</p>

Date of comment, format of comment, Commentator	Comment	Response
		the EMP for dust control during construction to mitigate the emission. Construction is relatively short lived and dust impacts are generally limited spatially.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 69, and Zone 10 South, Page 68, Table 4-2 This dates back four years - how relevant will these still be?	Responses to comments provided on the BID are included for completeness and have been updated in accordance with subsequent changes in project scope.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 72, and Zone 10 South, Page 71, Table 4-3, comment by DEFF Millicent Solomons Which four applications are these?	This refers to the four applications making up the overall CDC gas to power project, as described in Section 1.1 of the FSR.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 72, and Zone 10 South, Page 71, Table 4-3 SRK response to TNPA Renee de Klerk first comment relating to infrastructure Is this letter still applicable - date?	The letter from TNPA authorising the EIA is dated 5 March 2019.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 72, and Zone 10 South, Page 71, Table 4-3 SRK response to TNPA Renee de Klerk third comment relating to infrastructure Would this require any further authorisation or is it catered for in the authorisations for the existing port infrastructure.	The additional port infrastructure required is applied for as part of the Gas infrastructure EIA.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 74, and Zone 10 South, Page 73, Table 4-3 SRK response to DEFF Millicent Solomons first comment relating to alternatives As continuously highlighted throughout the comment on the report, the preferred alternative should include the technology that is preferred.	[CDC] Different technologies are considered to allow the procurement process to be competitive and to allow different technologies which have different efficiencies to be explored. [SRK] The proposed approach to the EIA is to present a preferred alternative that includes a range of technologies for approval. This is due to the fact that a preferred bidder for development of the power plant has not yet been assigned and the specific technology presented by that bidder therefore remains unknown but will have to fall within the parameters of what has been assessed via the EIA and what is authorised. This approach was discussed and agreed to with DEFF during pre-application meetings.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 74, and Zone 10 South, Page 73, Table 4-3 SRK response to DEFF Millicent Solomons second comment relating to alternatives	[CDC] Beyond the interim period the fuel storage infrastructure will be utilised for back-up fuel when required. [SRK] for the gas infrastructure the FSRUs will be released and removed

Date of comment, format of comment, Commentator	Comment	Response
	How does this influence the design of such a plant i.e. can the same infrastructure be used for both.	from the port after they are no longer required and the onshore storage and regasification unit is operational (phase 2). Other infrastructure such as pipelines etc will remain in operation.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 78, section 5.2.7, and Zone 10 South, Page 77, Section 5.9 Assuming that waste effluent will be addressed separately.	Waste effluent will be treated on site to the required standards before discharge to the CDC's sewer network.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 78, section 5.2.9, and Zone 10 South, Page 77, Section 5.11 Potential pollution of storm water on site and how this will be dealt with?	[CDC] Stormwater will be captured through a lined stormwater attenuation pond that will be contracted within the site. It will be treated before discharge.
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 78, section 5.2.10, and Zone 10 South, Page 77, Section 5.12 Polluted stormwater?	[SRK] A site specific stormwater management plan will be required, to detail measures for separation of clean and dirty stormwater from the site, and management of polluted stormwater. This will be stipulated in the EMPr.
11/11/2020 Email Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 78, section 5.2.11, and Zone 10 South, Page 77, Section 5.13 Where will GHG be addressed?	This will be addressed as part of the climate change study (see ToR in Section 6.5)
Date Received: 11/11/2020 Format: Email Commentator: Department of Economic Development, Environmental Affairs and Tourism	Zone 10 North, Page 79, section 5.3, paragraph 3, and Zone 10 South, Page 78, Section 5.16, paragraph 3 This only addresses construction related impacts and not operational impacts.	Agreed. It is not intended to replace the project specific EMPr, which is required to address impacts at all phases of the development, but rather to add to it.
Date Received: 12/10/2020 Format: Email Commentator: Thabo Nokoyo (DEFF)	Thank you very much for copying Forestry this invitation to comment on this project. I think I mentioned to you that I am on my way out of the department with last date of duty being 31st October 2020 therefore all communications of this nature must be forwarded to my colleague Babes (Babalwa Layini) for swift and proper attention. I mean within given deadlines. Coming to the topic – we have Mrs Andrea Shirley who is the in house environmentalist at Coega IDZ attending to all matters pertaining to protected trees in there but we welcome direct communication on matters of this nature. You are kindly advised to work with her also she already has in possession licenses granted for disturbing/destroying protected trees granted by this office.	The IAP database has been updated accordingly and Ms Layini will be kept informed.
Date Received: 12/10/2020 Format: Email	Please ensure that you include natasha@dynamicfood.com and	Details have been added to IAP list

Date of comment, format of comment, Commentator	Comment	Response
Commentator: Adrian Vardy	heinreich@dynamicfood.com in copy on all mails on this topic.	
Date Received: 12/10/2020 Format: Email Commentator: Christophe Crillon	Please may you share the direct link to access the docs.	Direct email link emailed.
Date Received 12/10/2020 Format: Email Commentator: Ansa Coetzee (Sanitech)	Thank you for your email, please find attached our company profile.	Details have been added to IAP list.
Date Received: 13/10/2020 Format: Email Commentator: Lyndon Mardon	Your system has denied me access to the draft documents.	An updated link was sent to Mr Mardon and DEDEAT colleagues, who confirmed receipt.
Date Received: 20/10/2020 Format: Email Commentator: Sherina Shawe	<p>I wonder if you could please assist me with a development. I came across a Town Planning Notice for Eastern Cape for the Notice of EIA process and water use authorisation processes and availability of draft scoping reports for CDC gas to power project, Coega SEZ, Eastern Cape Province.</p> <p>I do not have any objections, I am an interested party and I wanted to know if you would please provide me with the details of the client or any professionals involved.</p> <p>I am interested in following the progress of the various stages of this development from the town planning stages, through design and construction. I follow all the building and construction projects in South Africa and Africa right from the conceptual stages up until construction is complete.</p> <p>Please can you provide me with the copy of the Background Information Document for this development?</p> <p>Any information would be greatly appreciated. Looking forward to your response.</p>	<p>Executive summaries emailed</p> <p>Details added the IAP database.</p>
Date Received: 12/10/2020 Format: Email Commentator: Thomas Blystad (Blystad Energy Management)	<p>With reference to your Executive Summary of above referenced project, on page vi you are staying as follows:</p> <p>"The report can also be accessed as an electronic copy on SRK Consulting's webpage via the 'Public Documents' link https://www.srk.com/en/public-documents</p> <p>This link does not contain the Scoping Report so I would appreciate if you could forward it to me by email.</p>	Direct link to access the reports was emailed to the commentator
Date Received: 21/10/2020 Format: Email	With reference to the Proposed Coega Integrated Gas-to-Power Project: Gas Infrastructure Draft	Details added to the IAP list

Date of comment, format of comment, Commentator	Comment	Response
Thomas Blystad (Blystad Energy Management)	Scoping Report, I would highly appreciate being registered as an Interested Party so that I am able to follow the process and participate in any public hearing which I assume you will arrange.	
Date Received: 21/10/2020 Format: Email Commentator: Thomas Blystad (Blystad Energy Management)	Further to my earlier communication, in the Gas to Power Gas Infrastructure DSR Final 20201006 document there is a reference to Carnegie Energie (2019) and in the References at the back of the document there is a reference to Carnegie Energie. (2019). Memo: Technical Inputs to Coega Gas to Power EIA Scoping Report. The memo is not copied in the Draft Scoping Report. Would the complete Memo be publicly available and if so can you direct me to where I can access it?	The Carnegie report is not currently publicly available, and forms part of the design information developed specifically for this project, on which our project description is based. The report is the property of the CDC and is not specifically required to be provided as part of the EIA process, and therefore SRK it is not in a position to make it available to outside parties.
Date Received: 27/10/2020 Format: Email Commentator: Tim Foxen	I represent Monetizing Gas Africa(MGA). MGA develops gas to power facilities in southern Africa and therefore has an interest in this project. I would like to be added as an Interested and Affected Party to SRK's ongoing environmental review process for the Coega Gas to Power Project: Gas Infrastructure. We understand the public comment period for the draft scoping report goes through 9 November. Please also advise if a public webinar has/will take place on this project.	IAP was reminded of comment period closing date, provided with a direct link to access the reports, and details added to the IAP list.
Date: 03/11/2020 Format: Email Commentator: Tim Foxen	MGA is considering submitting comments on the gas infrastructure draft scoping report. In order to understand facts relevant to these comments, would you kindly answer the following concerning the second SRK response pasted in below: What is the name and status of the "EIA process initiated by the Department of Energy" pertaining to either the LNG berth and FSRU?	The comments and responses referred to result from public participation that was conducted in 2016 for the CDC gas to power project. At that stage the Department of Energy was running a separate EIA process for the FSRU and related port infrastructure. These components have subsequently been incorporated into the CDC's Gas infrastructure EIA and the DoE's separate EIA process has been terminated.
Date: 04/11/2020 Format: Email Commentator: Frans Stapelberg	Thanks: I have no problem with that	Details added to the IAP list
Date Received: 04/11/2020 Format: Email Commentator: Sherina Shawe	Please can you tell me the status of this EIA? Have there been any reports submitted since we last spoke? if so - Please may I have a copy?	I assume you have been included as an IAP for this project (now called CDC gas to power project). If so, you will receive updates as and when appropriate, and would have received a link to download the relevant documents from our website

Date of comment, format of comment, Commentator	Comment	Response
		– please refer to the email sent to IAPs with notification of the DSRs. If not, please liaise with Lyndle to be registered as an IAP.
Date Received: 04/11/2020 Format: Email Commentator: Sherina Shawe	I had registered when I first found out about it and I had confirmed this with Wanda in March. Unfortunately I have not received anything since then. Please can you send me the link with the relevant reports	Details added to the IAP database. Link to project and executive summaries were emailed.
Date Received: 03/11/2020 Format: Email Commentator: Mike Cohen	Do you have a document that ties the various projects together – This is only for interest	The overview of how the projects fit together are provided in the executive summaries. Kindly also refer to Chapter 1 of the DSRs. There isn't any other document currently available that gives more detail on the interaction between the various projects. Herewith the direct link to the project https://docs.srk.co.za/en/za-cdc-coega-3000-mw-gas-power-project-eias
Date Received: 10/11/2020 Format: Email Commentator: Tim Foxen	One of my colleagues, at BEM, wants to know if the comments that are made public are merely paraphrased but not directly redistributed/posted on a website? Sorry to bother you about that, but I erred in assuming that the attachment is fully public (the written narrative is not the concern). In fact, that attachment has already been shared with Transnet, CDC and the IPP Office, but not the general public, i.e. on a website. If possible, may I either delete or provide an alternate attachment?	Yes the comments will be made available to the public and authorities with the FSR, as per the EIA regulations. The comments will be appended to the report both as copies of the original comments, as well as tabulated with corresponding responses, which will be made available to all IAPs and on our website. The comment period for the DSR is however closed so we cannot accept additional comments at this stage, however if you would like to retract some / all of your comments, please send us that request in writing, together with a revised copy of the comments with the retracted comments / statements deleted. We will need this by tomorrow please.
Date Received: 12/11/2020 Format: Email Commentator: Christell du Plessis (Habitat Link Consulting)	Kindly register me for the above project as the independent ECO for the Coega SEZ and please provide me with the relevant link to download documents.	Details added to the IAP register and project link emailed.
Date Received: 16/11/2020 Format: Email Commentator: Ane Oosthuizen and Rob Milne (SANParks)	SANParks are in the process of preparing comments and will submit to you as soon as completed.	Please note that any comments you wish to make on the DSRs that we are unable to address in the FSRs will be submitted directly to DEFF so that they can take them into account in their decision on the FSRs, and furthermore we will address them in the Draft EIR. Please do not hesitate to contact me should you have any queries about this.

Table 5: Comments and Response on the Draft Scoping Report for Gas to Power Gas Infrastructure

Date of comment, format of comment, Commentator	Comment	Response
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	Figure 1-3 in the DSR do not include the Appeal process.	Details of the appeal process will be communicated to IAPs with the Environmental Authorisation, as per the legal requirements.
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	Reference list for the DSR, Branch 1988a, Branch 1998 and Branch 1999 are omitted from the reference lists	These have been included in the reference list.
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	The increase in shipping resulting from one LGNC delivery every three days will inevitably increase the risk of accidents that could potentially result in a spillage of oil/fuel within the bay. This could have catastrophic consequences for the African penguin, which has seen a drastic population decrease over the last 20 years and is now listed as globally and regionally Endangered. According to this report, Algoa Bay holds 43% of the African penguin population with the largest single colony being at St Croix Island, within close proximity of the planned development.	Impacts of potential spills and pollution resulting from the project are included in the Marine Ecological specialist study (see Terms of Reference in Section 6.5 of the DSR), which will be provided as an appendix to the Draft EIR.
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	Increased turbidity of the water column at the dredge dumping site may potentially interfere with foraging of seabirds, particularly the African penguin. This should perhaps be investigated as part of the Marine Ecology specialist study.	Impacts on water turbidity resulting from the project are included in the Marine Ecological specialist study (see Terms of Reference in Section 6.5 of the DSR), which will be provided as an appendix to the Draft EIR.
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	Section 3.6.2, Birds, paragraph 2, last sentence. This statement is incorrect. A small population of Roseate Terns breeds annually at Dyer Island, near Gansbaai, off the coast of the Western Cape.	This has been updated in the FSR.
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	Section 3.6.2, Birds, paragraph 3: the first and last sentences require a reference.	This has been included in the FSR.
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	Section 3.6.2, Birds, paragraph 4: What is meant by "congregatory threshold" and what is the relevance of this?	This statement has been removed from the FSR.
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	Section 3.6.2, Birds, paragraph 5: Use Taylor et al. (2015) rather than Barnes (2000). Taylor et al. (2015) lists blue crane as Near Threatened, and Martial eagle and African marsh harrier as Endangered.	This has been updated in the FSR
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	Section 3.6.2, Birds, paragraph 6, lines 4-8: This is incorrect and misleading. You cannot compare a regional Red List assessment (Barnes 2000) with a global Red List	This has been updated in the FSR

	<p>assessment (BirdLife International) as they are different entities. Barnes (2000) has now been updated anyway by Taylor <i>et al.</i> (2015) and the global information given also needs updating. Under the regional Red Data list Damara Tern is listed as Critically Endangered and African Black Oystercatcher as Least Concern (Taylor <i>et al.</i> 2015). Globally, Damara Tern is listed as Vulnerable and African Black Oystercatcher as Least Concern (BirdLife International 2020). BirdLife International (2020) IUCN Red List for birds. Downloaded from http://www.birdlife.org on 06/11/2020.</p>	
<p>Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington</p>	<p>Section 3.6.2, Birds, paragraph 7: Secretarybird has been uplisted to Vulnerable by Taylor <i>et al.</i> (2015).</p>	<p>Reference to the damara tern colony is provided in Section 3.6.2 as well as in the environmental sensitivity map and Section 5.</p>
<p>Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington</p>	<p>Given the close proximity of the Greater Addo Elephant National Park, why were no representatives of South African National Parks invited to register as Interested and Affected Parties?</p>	<p>SANPARKS representatives have been notified of the project and included in the IAP database.</p>
<p>Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington</p>	<p>Page 80, Table 4-2, comments relating to Damara Tern: Given the inaccuracy of some of the information on birds provided in the draft scoping reports one has to call into question SRK's view that "no further assessment of bird related impacts is required". On what grounds is this statement made and what ornithological expertise does SRK have to support this statement?</p>	<p>The damara tern population in question has been monitored and reported on a regular basis by Dr Paul Martin, a local ornithologist, as part of an ongoing project in the CDC. SRK has reviewed the relevant monitoring reports and it is on that basis that the statement is made. Marine bird related impacts are addressed in the Marine Ecological study (see Terms of Reference in Section 6.5 of the DSR).</p>
<p>06/11/2020 Email Philip Whittington</p>	<p>I have some concerns over the effect of the discharging of warm water into the bay on the prey species of the Damara Tern. Little is known about the diet of Damara Terns in Algoa Bay or on where the terns forage. I think a study of diet and foraging behaviour of the Damara Terns needs to be carried out as part of the Marine Ecology specialist study or as a separate exercise before Environmental Authorisation can be given for this part of the project.</p>	<p>Discharge of cooling water via the Marine Pipeline Servitude is addressed via a separate EIA process for that project. Marine related impacts specifically related to the gas infrastructure project (this EIA) are addressed in the Marine Ecological study (see Terms of Reference in Section 6.5 of the DSR).</p>
<p>Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington</p>	<p>Pages 79-81, Table 4-2: In response to comments regarding marine organisms and the sand by-pass system it is stated that "Marine impacts are outside the scope of this EIA process" and yet section 6.2 clearly indicates that a Marine Ecology Assessment specialist study will be carried out as part of the Impact Assessment phase of this project. Given that this project</p>	<p>This response was provided on the 2016 BID and has subsequently been updated to reflect the change in project scope. See Table 2 above.</p>

	includes the establishment of a LNG terminal within the port of Ngqura and dredging activities it cannot be justifiably stated that "Marine impacts are outside the scope of this EIA process".	
Date Received: 06/11/2020 Format: Email Commentator: Philip Whittington	In Appendix I, the proposed north and south power plants are labelled the wrong way round. "Damara Turn" should be "Damara Tern". The same applies to Appendix I for the Zone 10 North and Zone 10 South DSRs	These errors have been corrected in the maps provided in the FSRs
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	The Draft Scoping Report (DSR) says that the marine pipeline servitudes will not be covered by this EIA because they are the subject of a separate Marine Intake / Outfall Servitude EIA. However, the Scoping Report for that project was recently rejected by DEFF. How will this affect the EIA process for this project?	That is correct, however CDC has resubmitted an application for the MPS EIA and is of the hope that it will be authorised at some point. To accommodate this uncertainty however options are provided for the CDC's gas to power project to operate in the absence of the Marine Pipeline Servitude.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	Most of the layout figures (e.g. Fig 1.1, Fig 1.2) show the gas pipelines crossing the Eastern Reclamation. This is presumably not a feasible option as the Eastern Reclamation is used for ongoing material spoiling and recycling during construction projects. However, Fig 2.8 shows a more feasible route option for the gas pipelines. The Environmental Impact Report (EIR) needs to assess and recommend preferred pipeline route(s).	This has been raised with CDC and the design team and will be further addressed in the FSR. Figure 2.8 has been removed in the FSR and an updated layout for the pipeline will be provided in the Draft EIR.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	How will leaks (especially on underground pipelines) be identified and dealt with?	[CDC] There are various techniques to identify and manage leaks on the pipelines, whether it is under/above ground. This will be determined during the following phase of the study, inclusive of the concept design. The concept designs will be utilised to determine the impact related to the leaks.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	The DSR indicates several methods of dealing with Boil Off Gas – the EIR needs to indicate what method will be used under what circumstances	[CDC] It is confirmed. The EIR will indicate the methodology for dealing with boil off gas.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	It may be better to have a separate EIA for the marine component of this project (facilities for LNG gas hub and distribution facility in the PoN). Reason: There are several EIAs in process for gas to power facilities. All of them require Liquid Natural Gas Vessels and a Floating Storage Regasification Unit (FSRU) to berth near the Eastern Breakwater. Clearly, there is room for only one gas hub within the Port to supply whatever gas projects are implemented. This DSR evaluates the alternatives and proposes a clearly thought out design of a port	At the time of planning the approach to the EIA and pre-application discussions with DEFF in 2019, SRK was not aware of the other proposed gas to power projects in the SEZ, which seem to have been stimulated largely by the recent opening of the bidding process for the RMIPPP. The decision to include all gas infrastructure under a single application was largely based on the assumption that, due to the inter-related nature of the infrastructure, it would be undertaken by a single developer, and therefore a single

	based facility that can be converted to supply a land-based facility (Option 2, Section 2.6.3).	authorisation seemed administratively most efficient.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	The DSR does not make it clear whether the Marine Ecology Specialist Study will include three dimensional modelling of the water plume from the FSRU. The FSRU will drop water temperatures by 8C – what impact will this have on the fish, invertebrates and avifauna in the port and will it impact the adjacent Marine Protected Area?	Three dimensional modelling is outside the scope of the marine ecological study (see ToR in Section 6.5). However the specialist has confirmed that based on previous studies the footprint of this plume is likely to be very localised and restricted to a few hundred metres around the vessel. This will be detailed in the specialist report.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	How frequently will the hull of the FSRU be cleaned and using what methodology? PoN has many alien hull foulant species.	The marine ecologist has confirmed that the risks of hull cleaning would be similar to ballasting. As the FSRU is stationary, hull cleaning is unlikely to be necessary very frequently (it is usually undertaken to improve vessel speed and performance and with FSRU being permanently moored this should not be a requirement). Spread of alien invasive species in the port is covered in the assessment.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	The DSR looks at detailed alternatives for the gas hub in the Port of Ngqura but no alternative locations or designs for the land-based gas hub (and the three gas to power facilities). The land based gas hub is not dependent on seawater and therefore there seems to be no reason why alternative locations cannot be considered (i.e. further inland away from the Damara Tern colony - see below).	[CDC] The DSR is not considering gas hub alternatives in the Port of Ngqura. The distance from the port is an important criteria in terms of the cost of the cryogenic pipeline, hence the gas hub should be located as close as possible to the berth within the SEZ. Accessibility to road infrastructure for transportation for distribution to 3 rd parties was also taken into account.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	No site photographs of the Zone 10 site are provided.	Site photographs of the area of the LNG and gas hub in zone 10 have been included in Appendix J.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	Why three power stations instead of one phased development (the answer to the same question in response to the 2016 BID is still not clear – are there limits to generation capacity for Independent Power Producer licences?).	[CDC] the IRP 2019 requires 1000MW by 2024 and further 2000MW by 2027 all be generated from gas.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	It is not clear under which of the four EIAs the power transmission lines fall. Why is the connection to the Dedisa Sub-station and not the closer Sonop Sub-station? Presumably larger capacity conductors can be strung on the existing Sonop-Dedisa line if required?	[CDC] Sonop is municipality sub-station and Dedisa is a national substation hence the consideration of Dedisa. Dedisa is 400KV and this project will evacuate power at 400KV.
Date Received: 07/11/2020 Format: Email Commentator: Paul Martin	Table 6.1 Site Sensitivity Verification. The Screening Tool identified the Animal Species Theme as High Sensitivity whereas the EAP has assigned a Low Sensitivity Verification. Unless the EAP can	The EAP has assigned the low sensitivity rating as the site development footprint area is largely transformed by sand mining, as well as development of the port and related infrastructure. It is recognised

	<p>guarantee that potential impacts are manageable, this cannot be correct for the following reason:</p> <p>The land based gas hub and distribution centre in Zone 10 is located approximately 200-250m from a colony of Critically Endangered Damara Terns (Critically Endangered in South Africa (SA Red Data Book – Birds 2015) and in the Marine Threatened or Protected Species Regulations, Government Notice No. 476 dated 30 May 2017). Globally it is classified as Vulnerable. Of the estimated 54 pairs of Damara Tern breeding in South Africa, a median of 3-4 pairs nest at this colony. The Avifauna Impact Assessment and Damara Tern Specialist Report for the Coega Mining Right adjacent to this project (Martin 2019) provides details of some potential impacts including sand starvation, disturbance, predators and scavengers.</p>	<p>however that extremely sensitive species are present in areas adjacent to the development area, and some may be present within it. This particular damara tern population has also been relatively well studied and monitoring is in place. It is therefore proposed that the EMPr will include management measures to address these species. It is also noted that clearance of vegetation within the SEZ is not applied for as a listed activity as part of this EIA as this has already been authorised and assessed via the EIA for rezoning of the SEZ. A specialist terrestrial ecological specialist study is therefore not proposed as part of this EIA.</p>
<p>Date Received: 07/11/2020 Format: Email Commentator: Paul Martin</p>	<p>The Noise study needs to include the Damara Tern colony as a sensitive receptor.</p>	<p>This has been communicated to the noise specialist and included in the ToR for the study (Section 6.5. of the Zone 10 power plant FSRs)</p>
<p>Date Received: 07/11/2020 Format: Email Commentator: Paul Martin</p>	<p>There are several other avian Species of Conservation Concern that occur in the area (terrestrial and marine) and that feed in the PoN. However, the impact on Damara Terns is likely to be the single biggest threat to avifauna.</p>	<p>This statement is noted. Impacts on Damara tern will specifically be addressed in the EIR as well as EMPr.</p>
<p>Date Received: 07/11/2020 Format: Email Commentator: Paul Martin</p>	<p>Section 3.6.2 Fauna – Birds is very outdated and in many parts incorrect. SA Red Book conservation status is based on Barnes (2000) instead of Taylor (2015). The Avifauna Impact Assessment and Damara Tern Specialist Report for the Coega Mining Right (Martin 2019) provides up to date information on avifauna for the Zone 10 area.</p>	<p>This has been updated as far as possible based on the references provided.</p>
<p>Date Received: 07/11/2020 Format: Email Commentator: Paul Martin</p>	<p>2002 Port RoD Condition 2.18: “The NPA must ensure that the Duthies golden mole and Pygmy hairy-footed gerbil occurring in the dune habitats in the Coega area are included in the relocation and management plan to the satisfaction of the relevant provincial environmental department”. See attached that includes a discussion that <i>Gerbilliscus paeba exilis</i> that has known colonies at the bases of the Ngqura breakwaters may be a distinct threatened species.</p>	<p>Mention of the possible presence of <i>Gerbilliscus paeba exilis</i> is included in the FSR and relevant management measures from the Port RoD will be included in the EMPr.</p>
<p>Date Received: 07/11/2020 Format: Email</p>	<p>My Comments on the 2016 Background Information Document</p>	<p>The responses provided on the 2016 BID have been updated to reflect the</p>

<p>Commentator: Paul Martin</p>	<p>Many of my comments on the 2016 Background Information Document are still relevant. Please check all of the responses to my comments on the 2016 BID to see if the responses are still relevant and appropriate (e.g. my comments on marine impacts that at that time were stated not to be part of the EIA).</p>	<p>subsequent change in project scope. See Table 2 below.</p>
<p>Date Received: 09/11/2020 Format: Email Commentator: Tim Foxen</p>	<p>Comments on section 2.6.2, Site Alternatives.</p> <p>It is reported that an existing Environmental Authorization states that no infrastructure may be built along the eastern breakwater and therefore layout 1, the preferred alternative, avoids locating access routes or pipelines on this existing breakwater. MGA comments that more recent discussions indicate there is some flexibility for this criteria. MGA suggests that CDC engage with TNPA on this matter to clarify conditions under which the breakwater can be used for certain access and quayside infrastructure. This, in turn, may allow for additional alignment alternatives discussed below.</p>	<p>[CDC] It is confirmed that between CDC and Transnet there is flexibility</p>
<p>Date Received: 09/11/2020 Format: Email Commentator: Tim Foxen</p>	<p>Comments on section 2.6.3 – Layout and Alignment Alternatives</p> <p>BEM has recently shared an alternative alignment with CDC and TNPA that would avoid dredging and meet safety and operating criteria. It incorporates a quayside, T-shaped mooring. The conceptual design is shown below as Figure 1. . It is important to note that this layout supports two integrated LNG-fueled power barges “inside” the T and a permanently moored LNG carrier outside the T. The proposed quayside berth would be a concrete structure supported by pilings. It would facilitate access and could also be used for a regasification unit that would allow for phased increases of natural gas supply to support the land-based power generation being proposed in the accompanying EIAs for Zone 10 and Zone 13. For both economic and environmental reasons described in the comment section below on phasing, MGA asserts that this conceptual alignment merits being listed as an alternative. It is requested that the EIA process considers alignment with the October 2016 Information Memorandum of the IPP office in stating: “the adoption of an FSRU (or equivalent LNG regasification and storage technology) lends itself to the</p>	<p>[CDC] it is confirmed that BEM has recently shared an alternative alignment with CDC that would avoid dredging and meet safety and operating criteria. This will be further assessed.</p> <p>[SRK] the changes suggested are not currently part of the application or project description provided in the scoping report.</p>

	development of the Project(s). For the purposes of the programme, the term FSRU includes equivalents such as Floating Storage Units plus shore-based or barge-based regasification”.	
Date Received: 09/11/2020 Format: Email Commentator: Tim Foxen	<p>Comments on section 2.7 - Phasing</p> <p>This section notes that phasing LNG infrastructure to meet power demand as needed would call for one or two FSRU's to be sited at the preferred location, to be followed by a land-based LNG terminal if and when demand justified the additional capital investment. MGA comments that the proposed BEM integrated LNG-fueled power barge provides an initial smaller scale solution that can be phased to supply gas to the zone 10 and zone 13 power plants at lower cost and risk. The reason for this are several:</p> <ol style="list-style-type: none"> 1. Initial power generation on one or two barges would use fast-start, dispatchable reciprocating engines that would only run when needed and would not have a minimum run requirement. 2. The electric interconnection required would be designed and routed to accommodate a gas pipeline that could be built at the same time or at a future date. 3. A lower cost Floating Storage Unit would be used at significantly lower cost than an FSRU. 4. As land-based power generation was developed, a regasification unit could be installed on the quayside, sized as needed to meet the power generation gas requirement, avoiding the unnecessary large scale FSRU. <p>Therefore, the concept of phasing discussed in this section of the DSR should be expanded to consider the possibility of LNG-fueled power barges using the conceptual mooring design discussed above, as equivalent alternatives.</p>	<p>[CDC] The CDC's project description does not incorporate power barges at the initial stage of the project. Additional scope change will be included during an amendment of the Environmental Authorization if required.</p> <p>[SRK] the changes suggested are not currently part of the application or project description provided in the scoping report.</p>
Date Received: 09/11/2020 Format: Email Commentator: Tim Foxen	<p>Comments on section 4.2.2 – Registered I&AP Issues Raised – Table 4-3 Comments Raised by stakeholders at the Coega ELC Meeting of 20 August 2020, Comments related to Infrastructure</p> <p>MGA observes the TNPA comment by Renee Klerk. The restrictions of activities on the eastern breakwater should be reviewed and revisited so that appropriate tradeoffs are considered.</p>	<p>It is SRK's understanding that all conditions of the existing RoD for the Port of Ngqura are to be complied with, unless TNPA as holder of the authorisation applies for amendment / relaxation of these conditions. SRK is not aware of any such amendment and it is therefore on this basis that the port infrastructure was designed.</p>

<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>(a) Listed Activities i. Please ensure that all relevant listed activities are applied for, are specific and can be linked to the development activity or infrastructure as described in the project description.</p>	<p>We believe that the listed activities, as described in table 1-1, are specific and can be linked to the development activity.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>ii. If the activities applied for in the application form differ from those mentioned in the final SR, an amended application form must be submitted. Please note that the Department's application form template has been amended and can be downloaded from the following link https://www.environment.gov.za/documents/forms.</p>	<p>An amended application form is submitted with the FSR. SRK has confirmed that the latest version of the application form available on the Department's website has been used.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>(b) Layout & Sensitivity Maps i. Please provide a layout map which indicates the following: a) Position of all infrastructure e.g. storage tanks, gas supply pipelines etc.; b) Permanent laydown area footprint; c) All supporting onsite infrastructure e.g. roads (existing and proposed); d) Substation(s) and/or transformer(s) sites including their entire footprint; e) Connection routes (including pylon positions) to the distribution/transmission network; and f) All existing infrastructure on site</p>	<p>Layout maps, indicating these features where applicable, are included as Appendix I of the Final Scoping Report, and in the updated Application form (Appendix B). There is no substation required for the gas infrastructure.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>ii. Please provide an environmental sensitivity map which indicates the following: a) The location of sensitive environmental features on site e.g. CBAs, heritage sites, wetlands, drainage lines etc. that will be affected; b) Buffer areas; and, c) All no-go areas.</p>	<p>The environmental sensitivity map included as Figure 3-6 includes the features mentioned. No buffer or no-go areas have been identified as yet, however these will be included in the Draft EIR should such areas be identified in specialist studies.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>The above layout map must be overlain with the sensitivity map and a cumulative map which shows neighbouring energy developments and existing grid infrastructure.</p>	<p>A cumulative map, showing the neighbouring energy developments (existing and proposed) that SRK is aware of is included as Figure 6.1, in the FSR.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>(c) Public Participation Process i. Please ensure that all issues raised and comments received during the circulation of the draft SR from registered I&APs and organs of state (including this Department's Climate Change</p>	<p>Copies of correspondence sent to the various stakeholders are included in Appendix G of the FSR. Copies of comments received from IPAs are included in appendix H of the FSR.</p>

	<p>Section) which have jurisdiction in respect of the proposed activity are adequately addressed in the final SR. Proof of correspondence with the various stakeholders must be included in the final SR. Should you be unable to obtain comments, proof should be submitted to the Department of the attempts that were made to obtain comments.</p>	
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>The Public Participation Process must be conducted in terms of Regulation 39, 40 41, 42, 43 & 44 of the EIA Regulations 2014, as amended.</p> <p>A comments and response trail report (C&R) must be submitted with the final SR. The C&R report must incorporate all historical comments for this development. The C&R report must be a separate document from the main report and the format must be in the table format as indicated in Annexure 1 of this comments letter. Please refrain from summarising comments made by I&APs. All comments from I&APs must be copied verbatim and responded to clearly, Please note that a response such as "Noted" is not regarded as an adequate response to I&AP's comments.</p>	<p>To the best of our knowledge, the public participation process has been conducted in compliance with these regulations.</p> <p>This comments and response table report (this report) is intended to comply with this requirement, including the format of this table.</p> <p>All historical comments received for this project are included in Table 2.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>The final SR must provide evidence that all identified and relevant competent authorities have been given an opportunity to comment on the proposed development particularly, the Eastern Cape Environmental Department, and the District and Local Municipalities.</p>	<p>Copies of correspondence sent to the various stakeholders are included in appendix G -of the FSR. A complete list of registered IAPs and potential IAPs who have been notified during this process, is provided in Table 1 above.</p> <p>Copies of comments received from IPAs are included in appendix G of the FSR.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>(d) Specialist Assessments</p> <p>i. Specialist studies to be conducted must provide a detailed description of their methodology, as well as indicate the locations and descriptions of infrastructure positions, and all other associated infrastructures that they have assessed and are recommending for authorisation.</p>	<p>The generic terms of reference for the specialist studies has been amended to address this comment.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>ii. The specialist studies must also provide a detailed description of all limitations to their studies. All specialist studies must be conducted in the right season and providing that as a limitation, will not be accepted.</p>	<p>The generic terms of reference for the specialist studies has been amended to address this comment.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>iii. Should the appointed specialists specify contradicting recommendations, the EAP must clearly indicate the most reasonable recommendation and substantiate</p>	<p>This will be addressed in the Draft and final Environmental Impact Reports.</p>

	<p>this with defensible reasons and where necessary, include further expertise advice.</p>	
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>(e) Cumulative Assessment</p> <p>i. If there are other similar facilities proposed within a 30km radius of the proposed development site, a cumulative impact assessment must be conducted for all identified and assessed impacts which must be refined to indicate the following:</p> <p>a) Identified cumulative impacts must be clearly defined, and where possible the size of the identified impact must be quantified and indicated, i.e. hectares of cumulatively transformed land.</p> <p>b) Detailed process flow and proof must be provided, to indicate how the specialist's recommendations¹ mitigation measures and conclusions from the various similar developments in the area were taken into consideration in the assessment of cumulative impacts and when the conclusion and mitigation measures were drafted for this project.</p> <p>c) The cumulative impacts significance rating must also inform the need and desirability of the proposed development.</p> <p>d) A cumulative impact environmental statement on whether the proposed development must proceed.</p>	<p>This has been addressed in the generic ToR for specialist studies in the FSR and will be included in the cumulative impact assessments by each specialist</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>(f) Specific comments</p> <p>i. The proposed Air Quality and Climate Change assessment specialist studies terms of reference (TORs) must be made available to this Department's Climate Change Directorate for comments. Proof of correspondence must be included in the public participation report.</p> <p>ii. It is unclear why the No-Go alternative on page 62 of 130 of the draft scoping report makes references to developments within the Richards Bay IDZ.</p>	<p>i. The ToRs for the Climate Change and air quality specialist studies have been shared with DEFF's climate change Directorate for comment – see Appendix G4 for proof of correspondence. No feedback has been received to date.</p> <p>ii. Reference is made to developments in the Richards Bay IDZ in an attempt to demonstrate that while these projects may be competition to the Coega SEZ gas to power projects (i.e. may be developed as an alternative to Coega SEZ), the no-go scenario does not take this into account.</p>
<p>Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries</p>	<p>General</p> <p>You are further reminded to comply with Regulation 21(1) of the NEMA EIA Regulations 2014, as amended, which states that:</p> <p>"If S&EIR must be applied to an application, the applicant must, within 44 days of receipt of the application</p>	<p>The Draft Scoping Report has been available for public comment for a 30 day comment period from 9 October to 9 November 2020.</p> <p>The Final Scoping Report has been submitted within 44 days of the application having been received by DEFF.</p>

	by the competent authority, submit to the competent authority a scoping report which has been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority.	All comments received, including those of the competent authority and all other IAPs, are recorded and responded to in this tables. Copies of the comments received in their original form are included as Appendix G4.
Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries	You are further reminded that the final SR to be submitted to this Department must comply with all the requirements in terms of the scope of assessment and content of Scoping Reports in accordance with Appendix 2 and Regulation 21(1) of the EIA Regulations 2014, as amended.	The requirements of appendix 2 of the EIA regulations are reproduced in Table 1.2 -of the FSR, with a guide to how each of the requirements has been addressed in the FSR.
Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries	Further note that in terms of Regulation 45 of the EIA Regulations 2014, as amended, this application will lapse if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless an extension has been granted in terms of Regulation 3(7).	The requirement to stay within in the prescribed timeframes is noted.
Date Received: 11/11/2020 Format: Letter Commentator: Department of Environment, Forestry and Fisheries	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no activity may commence prior to an Environmental Authorisation being granted by the Department.	The applicant (CDC) is aware of this and has no intention to commence construction activities prior to authorisation being granted.